



BELLWETHER
H O U S I N G

Employee Handbook

Table of Contents

Welcome to Bellwether Housing!	7
Purpose of the Handbook	8
Section 1: About Bellwether Housing	9
Our Mission and Vision	9
Our Mission	9
Our Vision	9
Our Values	9
With One Another	9
With Our Residents	9
With Buildings and Resources	9
With Community Partners	9
Organization Overview	10
Our Commitment to Equity, Inclusion and Anti-Racism Work	10
Who We Serve	10
What We Do	11
Our Leadership	11
Leadership Team (LT)	11
Board of Directors	11
People Leaders	11
Our Teams	11
Executive Team	11
Property Management	12
Resident Services	12
Facilities Management	12
Real Estate Development	12
Finance	12
Fund Development and Communications	12
Human Resources (People and Culture)	12
Information Technology	12
Office Locations	13
South Lake Union Admin Office (aka CasaBell or downstairs)	13
Section 2: Employment Policies	13
Employment At Will in an At Will State	13
Equal Employment Opportunity	13
Employment Eligibility	13
Background Checks and Employment Verification Policy	13
All Positions	14

Positions with Driving Requirements..... 14

Positions with Financial Responsibility..... 14

New Employee Onboarding..... 15

Employment Introductory Period..... 15

Job Descriptions..... 16

Employment of Family and Friends..... 16

Referral Bonus..... 16

Re-Employment..... 16

Internal Job Opportunities – Transfers & Promotions..... **Error! Bookmark not defined.**

Section 3: Workplace Conduct 18

Hours of Operation 18

Remote Work..... 18

 Requirements..... 18

 Special Circumstances..... 19

Meal and Rest Breaks Specific to our Hourly Employees..... 19

Appropriate Attire..... 19

Fragrance in the Workplace..... 19

Standards of Conduct in the Workplace..... 19

Confidential Information 20

Conflict of Interest 20

Employee & Resident / Client Relationships..... 21

Solicitation..... 21

Gifts, Favors, and Payments..... 21

Whistleblower Policy..... 22

 Retaliation 22

 Reporting Violations and or Complaints..... 23

 Acting in Good Faith 23

 Accounting and Auditing Matters 23

Performance Reviews..... 23

Course Correction 24

Conflict Resolution..... 24

Voluntary Separation of Employment 25

Severance Guidelines 26

Employee Files and Disclosure..... 26

Release of Employment Information 27

Use of Bellwether-Owned Resources..... 27

Company Vehicle Use..... 27

Personal Vehicle Use..... 28

Bellwether Issued Smartphones and Tablets..... 28

Safety Issues for Telephone Use..... 28

On-Call Expectation for Positions as defined by Department Directors 29

Transportation and Commuter Policies..... 29

Bellwether’s Communication Systems 30

Bellwether Social Media Policy..... 31

Representation of Bellwether Housing to the Media and Public..... 31

Visitors in the Workplace 31

Section 4: Safety Policies..... 32

 Safety Overview..... 32

 On-the-Job Injuries or Illness 32

 Policy on Drug and Alcohol Use While on Duty 32

 Smoking Policy 33

 Harassment Free Workplace..... 33

 Sexual Harassment and Sexual Misconduct 33

 Workplace Violence Policy 34

 Reporting Procedures..... 35

 Risk Reduction Measures..... 35

 Dangerous or Emergency Situations 35

 Inclement Weather 36

 Arriving Safely at Work During Inclement Weather 36

 Emergency Cell Phone Numbers..... 36

Section 5: Attendance Policies..... 36

 Business Hours..... 36

 Absenteeism and Tardiness 37

 Reporting Absences..... 37

 Absence Without Notice/Job Abandonment..... 37

 Leaves of Absence..... 37

 Bereavement..... 37

 Domestic Violence/Sexual Assault Leave..... 37

 Family and Medical Leave Act (FMLA)..... 38

 Jury/Witness Duty..... 44

 Washington Family Care Act..... 44

 Military Leave..... 45

 Unpaid Leave for Personal Reasons / Leave Without Pay 45

 Out of Office Communication When on Leave..... 45

 Alternative Work Schedules..... 45

Section 6: Compensation and Payroll Policies..... 46

Compensation Reviews.....	46
Work Week	46
Overtime Pay and Compensatory Time For Non-exempt (Hourly) Employees	46
Compensatory Time.....	46
Holiday Hours.....	46
Pay Period, Timesheets, and Payday.....	47
Payday Advances	47
Direct Deposit	47
Pay Stubs.....	47
Payroll Deductions.....	47
Federal Withholdings.....	47
Labor and Industries	47
Garnishments, Attachments, and Judgments.....	47
Voluntary Employee Deductions	48
Employee Donations to Bellwether Housing.....	48
Expense Reimbursement.....	48
Travel and Entertainment Expenses.....	48
Company Credit Cards.....	49
Mission Advancement Bonus Policy	49
Eligibility and Process.....	49
Section 7: Bellwether Benefits	50
Eligibility.....	50
Summary of Eligibility for Company Benefits	50
Insurance.....	51
Health Insurance (Medical, Dental, and Vision)	51
Life Insurance	51
Long-Term Disability	51
Flexible Spending Accounts (Section 125)	51
Employee Assistance Plan (EAP).....	52
403(b) Retirement Savings Plan.....	52
Paid Time Off (PTO).....	52
PTO Eligibility.....	53
Availability.....	53
Leave Requests	53
Employee PTO Responsibility	53
Accrual of PTO	53
COVID-19 PTO Provisions.....	54
PTO Carryover.....	54

Holidays	54
Bellwether Holidays (effective January 2022)	54
Weekend Holidays	55
Holiday Pay	55
Holiday Eligibility	56
Working a Holiday	56
Learning & Development Policy	56
Training & Professional Development	56
Continuing Education Assistance	57
Required Position-Specific Training	58
We look forward to seeing you flourish and grow in your career	58

Welcome to Bellwether Housing!

We're happy you're here!

Bellwether Housing offers an uplifting work environment with a diverse group of talented professionals committed to the Bellwether Housing mission.

We value diversity of thought, abilities, education, race, ethnicity, national origin, religion, gender, gender identity, gender expression, sexual orientation, age, skills and level of experience. We believe that by pooling our unique talents and backgrounds we can accomplish our mission.

We emphasize inclusion and value people's individual experiences and perspectives. We are building a culture in which all voices are welcome, heard, respected and considered.

We are grateful you have chosen to join the Bellwether Team. We look forward to supporting your professional journey.

Susan Boyd, CEO
Bellwether Housing

Purpose of the Handbook

This handbook is designed to provide you with important information regarding employment policies and procedures, salary and benefits, your responsibilities to your job and Bellwether's commitment to you. It also gives an overview of our organization's history, structure and values.

Please read this handbook in its entirety. It is one of many ways we communicate with employees about our collective approach to having an encouraging, safe, and productive workplace. You will be asked to sign an electronic acknowledgement that you have read and understand the employee handbook. If you have questions about any of our policies, please contact your supervisor or the Human Resources Department.

Bellwether Housing reserves the right at any time to abandon, modify or supplement the contents of this handbook at its sole discretion. This handbook supersedes all previous versions of the handbook.

Section 1: About Bellwether Housing

Our Mission and Vision

Our Mission

Bellwether Housing creates stable communities and access to opportunity through affordable housing. We develop and manage homes for people with diverse socioeconomic backgrounds near job centers, transit, and services. In addition, we amplify our impact by helping other organizations in the Puget Sound do the same.

Our Vision

We envision diverse communities where people of all incomes and backgrounds share in the opportunity and prosperity of our region.

Our Values

With One Another

- **Accountability** – We embrace ownership and demonstrate initiative in our work.
- **Belonging** – We accept others and strive to make them feel like they are important members of the Bellwether team.
- **Collaboration** – We work with others readily, contribute our expertise and value the expertise of others to the benefit of a shared objective, project or mission.

With Our Residents

- **Community** – We share a common purpose. We foster trust, belonging and safety in our workplace.
- **Compassion and Humanity** – We demonstrate kindness, caring and willingness to help others.
- **Respect** – We value and honor the feelings, opinions, wishes, rights and traditions of others.

With Buildings and Resources

- **Innovation** – We relentlessly pursue continuous improvement, embrace new ideas and welcome change.
- **Stewardship** – We practice careful, responsible and ethical management of all our resources.
- **Sustainability** – We are committed to sustainable business practices and the preservation of the environment and its natural resources.

With Community Partners

- **Collaboration** – We work with others readily, contribute our expertise and value the expertise of others to the benefit of a shared objective, project or mission.
- **Integrity** – We are honest and consistently demonstrate uncompromising adherence to our values.
- **Leadership** – We use our influence to motivate ourselves and others to achieve shared objectives.

Organization Overview

Bellwether Housing was founded in 1980 to create affordable housing for workers in downtown Seattle. After 40 years, Bellwether is the region's largest nonprofit affordable housing provider.

Today, we serve over 3,500 residents in 2,100 homes. We serve families, seniors, and young people starting out. We also serve many veterans, immigrants, and workers being paid less than a living wage.

Our housing is near jobs, transit, schools and community amenities, increasing access to opportunity for our residents. By increasing access to the opportunity and prosperity of the region, our work cultivates a more vibrant and equitable city for all.

Looking forward, Bellwether will continue to integrate our four decades of expertise with new ideas and pioneering development approaches. Bellwether plans to add 2500 new homes to our portfolio by 2025 to meet the huge need for housing in urban King County.

Our Commitment to Equity, Inclusion and Anti-Racism Work

As a housing organization, we recognize that our country's housing system has had a major role in upholding the white supremacy our country was founded on. Discriminatory, predatory, and intentionally racist practices in the housing system have advantaged white people and disadvantaged Black people, other people of color and other minorities and under-privileged communities which has been a major contributor to the racial wealth gap. Our city has a history of housing segregation, redlining, and systematically denying people of color access to safe and affordable homes. We cannot do our work of creating equitable communities through housing without addressing racism. Housing justice is racial justice.

We aspire to become an anti-racist organization and are committed to doing the work to dismantle the racism within our organization and to carry it outside in our broader community.

Formed in 2016, our Equity Committee, comprising volunteer employees from across our organization, informs our DEI work. The Equity team has successfully pushed Bellwether to make our policies and practices more equitable and anti-racist. Changes include correcting pay disparities, pay scale transparency, holidays, communications practices and including DEI work goals in our individual, team, and organization work plans. We've also woven DEI work into our strategic plan for 2020-2025.

The Equity Committee has organized anti-racism trainings, educational/discussion events and publishes internal newsletters (which we occasionally share on our public blog). We started reporting our yearly DEI work in our annual reports last year, which are also available online. All Bellwether employees are welcomed to apply to join the Equity Committee.

Every employee is encouraged to be a part of making Bellwether more equitable and to look for opportunities to make our policies and practices at all levels of the organization more equitable. Employees are encouraged to make suggestions through their supervisor, the Equity Committee or the Human Resources team.

Who We Serve

We serve 3500 residents each year and expect this number to double by 2025 as our organization grows.

The average income for a Bellwether resident is \$25,557 a year.

Households range from families with children to seniors living on a fixed income to young adults starting out. Most residents are workers being paid less than a living wage. Many families are recovering from hardship, trauma and failures of the social safety net, such as homelessness, domestic violence, health issues, addiction, war and incarceration. This also include those hardworking individuals and families defined as the working poor. Many residents have been impacted by systemic marginalization and discrimination. ‘

Twenty percent of new residents move in directly from homelessness. Often these are families with children who have been living in their vehicles, couch-surfing, doubling up with friends or relatives or staying in shelters.

Bellwether residents are racially, ethnically and culturally diverse. About 52% of our residents identify as Black, Indigenous, or People of Color. Many residents are immigrants and refugees. Within our portfolio, residents speak many languages, including Chinese, Russian, Tagalog, Korean, Amharic, Tigrinya, Soninke, Vietnamese, Somali and Spanish.

We celebrate and respect the dignity, diversity and resilience of Bellwether residents.

What We Do

- We own and operate 35 (and counting) apartment buildings. Our apartments rent for around 50% less than market rate rents.
- We build and acquire new buildings.
- We actively repair and restore our buildings to keep them in good condition.
- We have onsite property management teams.
- We have a Resident Services program that provides service referrals and events to all residents for free.
- We advocate for city, state and federal policies that increase access to affordable housing, including, in Washington state, progressive tax reform.

Our Leadership

Leadership Team (LT)

Our 10-person leadership team consists of our CEO, COO, and department leaders. The leadership team meets every other week and works together to shape our organization’s policies and priorities. Notes from each Leadership team meeting are emailed to all staff by the CEO’s Executive Assistant.

Board of Directors

Our Board of Directors provides oversight and guidance. The Board is made of volunteers from a variety of industries who provide guidance on our operations, finances and strategic plans. The Board meets every other month to formally approve matters such as our annual budget, our plans to acquire sites for development and plans to apply for public funding.

People Leaders

Our People Leaders (people managers and supervisors) influence and motivate staff to apply their talents towards achieving our mission.

Our Teams

Executive Team

Our CEO, COO, and their respective Executive Assistants oversee the strategy and operations of Bellwether.

Property Management

The largest team at Bellwether, the Property Management team oversees all our properties. Site Managers manage day-to-day operations at each of our buildings. Portfolio Managers oversee the operations and budgets of several buildings. The Compliance team makes sure we are following all our legal obligations to our funders (government entities and banks who loan us money to build our apartments). Our Leasing team leases apartments to prospective residents. We also lease and operate commercial spaces on the ground floors of some properties (including both of Seattle's cat cafes!). Most of our revenue comes from our commercial and residential rents.

Resident Services

The resident services team provides free, confidential referrals to all residents. They work with residents to find resources like rental assistance, childcare, health care, and unemployment benefits. They also run community events at buildings.

Facilities Management

The Facilities team makes sure our buildings are clean, safe and well-maintained. The team responds to resident maintenance requests. We have in-house mechanics, plumbers, and electricians who can fix all kinds of issues. They are amazing!

Real Estate Development

Our development team builds and buys apartment properties. They identify and buy land to develop, put together budgets, secure funding and oversee construction. We pay for our buildings through financing from the city, county and state; private bank loans, federal tax credits and in some cases, grants and donations. Our construction management team works with our architects and general contractors to make sure our development projects are built as designed. They also oversee big repair / rehabilitation efforts at our existing properties. They also offer development services to other nonprofits.

Finance

The finance team keeps track of our budget and financial assets. They manage our organization's operating budget, audits and payroll. They keep track of the operating budgets and expenses at each of our 35+ buildings and all our current development projects.

Fund Development and Communications

The Fund Development and Communications team is small and mighty. They keep track of all our donations, apply for grants and run capital campaigns. They also manage our branding, social media, photography library, website, press releases and public relations. They can help you with graphic design projects, writing and editing and branding needs.

Human Resources (People and Culture)

Our HR team recruits, partners with managers to hire and onboards new staff to Bellwether. They manage our benefits, leaves, ADA accommodations, employment engagement, employee relations, learning development, manager capability and employment guidelines benchmarking, coaching, compensation analysis, and policies (like this handbook!). They oversee office management at our two administrative offices.

Information Technology

Our IT team makes sure everyone has the technology resources needed to do their jobs! They manage security, phones, software, hardware, and more. They can help you out with tech issues!

Office Locations

Bellwether Housing has one administrative office, as well as offices at most of our property sites for those in resident facing positions.

South Lake Union Admin Office (aka CasaBell or downstairs)

433 Minor Avenue North, Seattle, WA 98109

Section 2: Employment Policies

Employment At Will in an At Will State

Employment with Bellwether is “at will,” which means it is entered into voluntarily, and no employee has a contractual right, express or implied, to remain in Bellwether’s employ for any specific period.

Just as an employee may voluntarily terminate their employment with Bellwether at any time for any reason, Bellwether is also free to terminate an employment relationship at any time and for any reason.

All company correspondence, benefit or policy statements, performance appraisals, employee handbooks and other employee communications do not establish promises of specific treatment in specific situations, nor should the language be construed as creating a contract, express or implied. No Bellwether employee, People Leader, or other representative of the company (other than the Chief Executive Officer or Board of Directors) has the authority to enter into any verbal or written employment agreement or contract for any specified period, or to make any agreement contrary to the above “at will” guidelines.

Equal Employment Opportunity

Bellwether is committed to a policy of equal employment opportunity for all employees and applicants for employment, without regard to race, color, creed, religion, sex, age, national origin, ancestry, marital status, veteran or current military status, sensory, physical, or mental disability, use of a service animal, sexual orientation, gender, gender identity, gender expression, political ideology and all other classes protected by law. All employees and applicants will have the freedom to compete on a fair and level playing field with equal opportunity for competition. Equal employment opportunity covers all employee/employment programs, management practices, and decisions, including recruitment/hiring, merit promotion, transfer, reassignments, training and career development, benefits and separation.

Employment Eligibility

Bellwether will hire only those who are legally authorized to work in the United States in keeping with the Immigration Reform Act. Bellwether requires each employee to provide proof of identity and eligibility to work within the U.S. as part of the I-9 process within three (3) business days of employment. Bellwether reserves the right to rescind an offer of employment if this requirement is not met within the first three (3) business days of employment.

Background Checks and Employment Verification Policy

Bellwether conducts multi-state criminal background checks on all candidates that are moved to the final round of interviews for the position in which they are being considered. Upon successful completion of the background check and reference checks a formal offer will be extended. For positions that require the use of a vehicle, Bellwether collects and reviews Motor Vehicle Records (MVRs) upon hire, then annually. Employees who drive their own vehicles for company purposes are required to provide proof of liability insurance every year.

These guidelines are aligned with our commitment to providing safe, secure, and stable housing for our residents, while attempting to minimize the disparate impact of criminal convictions on marginalized groups, especially people of color, by creating specific guidelines based on job requirements and considering fewer years of criminal history.

Bellwether applies three criteria to all positions due to the nature of our work with vulnerable populations, including seniors, children, people with mental illness and people with addictions.

All Positions

- No felony or gross misdemeanor convictions for crimes against persons (violent crimes, sexual crimes, extortion, burglary, robbery, arson, kidnapping, malicious harassment) within the last five years (on a rolling year basis) **sex offender status and convictions of crimes against children and the vulnerable will reviewed on a case by case basis*
- No convictions for drug crimes related to manufacturing or intent to distribute / sell within the last three years (on a rolling year basis)
- No convictions for drug possession within the last two years (on a rolling year basis)
- No convictions for white collar crimes including but not limited to, cybercrimes, embezzlement, and intellectual property.

Positions with Driving Requirements

- Must be licensed for no less than three years* (exceptions can be made with the approval of the Director of People & Culture and the Director of the Department)
- No drivers under the age of 21; drivers between the ages of 21 and 25 under the following circumstances:
 - Will not be driving 15 passenger vans.
 - Clean Motor Vehicle Records
 - Valid driver's license in effect for at least three years
- No more than one moving violation with one at fault accident in the last three years
- No more than two moving violations with no at fault accidents in the last three years
- No moving violations and no more than two at fault accidents in the last three years
- No violations for speeding more than 80 miles per hour
- None of the following convictions in the last three years:
 - Negligent homicide arising out of the use of a motor vehicle.
 - Aggravated assault with a motor vehicle
 - Driving under the influence of alcohol or drugs
 - Reckless driving
 - Hit and run
 - Speed contests / racing
 - Using a motor vehicle for the commission of a felony
 - Operation of a motor vehicle without owners' authority
 - Operation of a motor vehicle while unlicensed
 - Suspension or revocation of driver's license for anything other than failure to pay fines.
 - Operation of a motor vehicle during a period of license revocation or suspension
 - Any other criminal use of a motor vehicle

Positions with Financial Responsibility

- No felony convictions for financial exploitation in the last five years (embezzlement, extortion, forgery, identify theft, money laundering, theft) on a rolling year basis
- No misdemeanor convictions for financial crimes in the last three years on a rolling year basis

New Employee Onboarding

The Human Resource team leads onboarding for all new Bellwether hires to welcome them and set them up for success in their new role. Onboarding is intended to familiarize new employees with our work, culture, benefits and employment policies.

Human Resources will check in with new hires after 30 days to see how their new role is going, to make sure their learning is supported, and to answer any questions.

Your People Leader will check-in with a new hire at the end of their first 60-days. These check-ins also provide valuable feedback about the onboarding process overall.

Onboarding activities may include:

- A Human Resources orientation to welcome new hires, introduce our organization, and review employment policies
- Benefits orientation that reviews Bellwether's benefits package and enrollment procedures
- Information Technology orientation to familiarize new hires to our technology systems, tools, and equipment.
- Team and job orientation to familiarize new employees with the roles of everyone on their team, including theirs
- Safety training and/or pest control training that orients employees to our safety and pest control policies and practices.
- Opportunities to engage with Leadership Team members, including the Chief Executive Officer
- Opportunities to meet and socialize with coworkers
- An introduction to our branding platform

Employment Introductory Period

All positions have a 90-day introductory period. This applies to new hires, promotions, transfers, and re-hires. The introductory period is meant to give the employee time to learn the basics of their new job. It also gives their People Leader time to assess if they will be successful in the position. Expectations and assessment of the role are based on the job description.

During this period, the People Leader may assess quality of work; productivity; attendance; position specific requirements; and relationships with colleagues, leaders and customers/residents when applicable.

After 90 days of employment, People Leaders and the new hire will have a review. People Leaders will recommend to the department Director and the Human Resources Manager one of the following:

- Successful completion of the review period
- Extension of the review period for 30 days for further evaluation of a specified nature
- Termination of employment due to performance during the review period

If an employee does not meet the requirements of the job and/or does not show satisfactory progress and sustained improvement, Bellwether may end employment at any time without pursuing course corrections. Any behaviors that would typically result in course corrections, may result in termination of employment during the introductory period.

The Human Resources Manager will review any extension of the introductory period or termination of employment before the end of the introductory period. Completing the introductory

period does not change the at-will employment status and does not create an employment contract.

Job Descriptions

Every position has a written job description which outlines the role and responsibilities. The job descriptions are the guidelines for what to expect from the job and how performance is assessed. They are not intended to describe every duty and task an employee may be asked to complete. Job descriptions may be updated or changed during an employee's tenure at Bellwether's discretion.

Upon hire and then on an annual basis, employees will be asked to acknowledge they have read and understand the job description for their position.

If an employee finds that their existing job description does not accurately reflect their current duties, they are encouraged to suggest revisions to their People Leader. The Human Resources Manager will review and approve all job description changes before they are finalized.

Employment of Family and Friends

Bellwether welcomes employees to refer family and friends for employment at Bellwether.

However, in some situations, Bellwether will not hire family to avoid conflicts of interest. We will not hire relatives (including spouses, domestic partners, children, siblings, parents, and in-laws) in the following situations:

- When one employee would report to the other, either directly or indirectly
- When (in most situations) one employee would have access to confidential payroll, accounting, or human resources information
- In addition, due to compliance audit requirements, no two people who are related as described above may be employed in Accounting or Human Resources.

Bellwether employees must notify their People Leader and Human Resources of any potential Bellwether employment situations that may violate this policy. When possible, the People Leader and the Human Resources Manager or the Director of People & Culture will take action to make sure Bellwether is following this policy.

Referral Bonus

If you refer someone new to Bellwether for employment and they are hired onto the team, you may be eligible for a referral bonus. The bonus will be paid when the new hire completes their sixth month of employment.

Re-Employment

Employees who have voluntarily separated with Bellwether and are in good standing are eligible for rehire. If an individual is rehired within 12 months of their separation date, the rate of leave accrual and benefit plan eligibility will be the same as it was on their separation date. Except for this provision, the most recent date of hire shall be considered the employment date regarding satisfying benefit eligibility criteria for all Bellwether benefits. This includes health benefits, annual leave accrual, and 403(b) contributions.

Referring a former Bellwether employee for a position is not eligible for the referral bonus.

Internal Job Opportunities -Transfers & Promotions

Bellwether is committed to our employee's professional advancement. We strongly encourage internal applicants to apply for open positions whenever possible. To apply for an internal position, an employee must have held their current position for at least six months. The employee

must also have had a satisfactory performance in their most recent performance review and meet the minimum qualifications of the opening.

Employees desiring a transfer or promotion should discuss it with their People Leader. The current People Leader will collaborate with the employee, the prospective hiring manager whose team has an opening, and Human Resources to determine the best course of action. All internal applicants in good standing, who meet the minimum requirements for the position will be interviewed by the hiring manager. If the employee is selected for the job, the current People Leader, new People Leader, and employee will arrange an effective date of the transfer that meets the needs of the organization. It is at the discretion of both People Leader's to determine if more than the standard two-week notice is applicable.

As stated earlier in this handbook, an employee who transfers into a new position is subject to the 90-day introductory period.

Section 3: Workplace Conduct

Bellwether is committed to creating a safe and productive work environment for all employees. Every employee contributes to making our workplace effective and positive.

Our workplace conduct policies are meant to outline appropriate behavior in the workplace and any situation in which employees are representing Bellwether Housing.

Not following the workplace conduct goals and standards may result in course correction up to and including termination of employment. Course corrections are intended to fix unacceptable behavior, create accountability, and improve the work environment.

Hours of Operation

Bellwether's operating hours vary depending on departments, positions, business needs and the needs of our residents.

Operating hours at the South Lake Union office vary between 7:00am and 6:00pm, Monday through Friday. Employees that are located on-site at a Bellwether Housing residential property will have schedules that best support our residents Monday through Friday and some weekends as appropriate. This includes but is not limited to, Facilities & Maintenance, Site Management and Resident Coordinators. However, we encourage employees to work directly with their People Leader and Director when it comes to acceptable core hours for their department, positions, and nature of the work.

Remote Work

Bellwether considers working remotely to be a viable, flexible work option when both the employee and the job are suited to such an arrangement and when working remotely poses no negative impact for our residents or the organization. Working remotely may be appropriate for some employees and jobs but not for others.

Remote work arrangements must be audited by each People Leader and reviewed by the Director on a quarterly basis to ensure the agreement continues to meet the business needs and that the employee's work remains consistent and of high quality. Working remotely is not a company-wide benefit or entitlement. An employee's ability to work remotely can be changed by the business at any time.

Requirements

In order to qualify to work remotely an employee must agree to:

- Maintain the strictest of confidentiality of company and resident data.
- Must use a secure network to access data.
- Have an internet connection that is adequate for their job.
- Connect to the cloud and save their work directly.
- Have the equipment needed to complete their work. This may include some combination of company issued (e.g., laptop and a cell phone or phone stipend) and personal equipment (workstation and chair).
- Dedicate their full attention to their job duties during the core business hours for their specific position and department.
- Arrange for their schedules to overlap with those of their team members for as long as is necessary to complete their job duties effectively.
- Follow all meal, rest break, and attendance schedules agreed upon with their manager and in compliance with state law.
- Whenever possible, have their camera on during virtual meetings.
- Follow the accessibility guidelines for meetings.

- Keep their Outlook calendar current and up to date and communicate to their team and/or People Leaders when there is an adjustment.
- Set an Out of Office Notice when away for long periods of time or when out of the office.
- Forward office phone when working remotely.
- Actively engage with teammates and the wider organization.

Special Circumstances

In certain situations, Bellwether may direct employees to work remotely, for a period. Examples include but are not limited to; public health crises, construction projects that impact traffic throughout the region, long-term power outages and inclement weather.

Meal and Rest Breaks Specific to our Hourly Employees

Hourly employees are entitled to an unpaid meal period of at least 30 minutes which commences no less than two hours or more than five hours from the beginning of a work shift. Hourly employees will be paid for meal periods when required by Bellwether to remain on duty on site or at their prescribed work site during a meal period, such as attending a required meeting.

No hourly employee will be required to work more than five consecutive hours without a meal period. Hourly employees working three or more hours longer than a normal workday are entitled to at least one 30-minute meal period prior to or during the overtime period. In addition, hourly employees are entitled to a paid rest break of 10 minutes for each four hours of working time. Rest breaks should be scheduled as near as possible to the mid-point of the work period.

No hourly employee will be required to work more than three hours without a rest break. When the nature of the work allows hourly employees to take intermittent rest breaks equivalent to ten minutes for each four hours worked, scheduled rest breaks are not required. Hourly employees who have not been provided with a meal period or rest break according to these guidelines should notify their People Leader so that a break can be scheduled.

Appropriate Attire

Bellwether employees are expected to dress appropriately and use good judgment in their choices.

Bellwether employees in the Facilities and Maintenance department are issued Bellwether t-shirts to wear during their shifts so they are easily identifiable to residents. Facilities and Maintenance team members must wear closed toed shoes for safety.

Fragrance in the Workplace

Bellwether strongly encourages all employees to be respectful when using personal fragrance products at work, such as perfumes and colognes. Many people are sensitive or allergic to the chemicals in scented products, which can trigger a variety of health conditions such as asthma, COPD, allergies, and migraine headaches. This applies to the use of all scented products including but not limited to, perfume, cologne, air fresheners, plug-ins and scented oils.

Standards of Conduct in the Workplace

Bellwether's standing in the community depends on the quality of our work and the actions of our employees who represent Bellwether. Bellwether is unequivocal in our ongoing commitment to anti-racism and equity within our organization and the communities we serve.

We are proud of the employees who work for us, and they can be proud of the positions of trust they hold on behalf of Bellwether. Every Bellwether employee must continue to earn the trust and respect of our current and potential residents, co-workers, colleagues, business partners and stakeholders in everything we do and every action we take.

Bellwether is dedicated to maintaining a working environment built on integrity, honesty, mutual respect and trust. Employees are expected to maintain the highest degree of ethical standards in conducting work on behalf of Bellwether. Likewise, it is Bellwether's goal to work with business partners who observe the utmost degree of ethics in the performance of their own business practices. Bellwether is committed to the deterrence, detection, and correction of dishonesty in all business matters.

Unethical conduct is defined as:

- Using one's position, power or authority gained through employment with Bellwether for one's own personal gain and benefit.
- Willfully breaking any federal, state, local law or rule.
- Willfully endangering the public health or safety of Bellwether employees, residents, applicants, colleagues or those with whom we do business.
- Willfully sharing or revealing confidential information related to our business, colleagues and residents.
- Willfully disregarding direction from your immediate People Leader and or People Director.
- Willfully misleading or providing false statements.

Confidential Information

Bellwether keeps certain information about the operations, activities and business affairs of the company and our employees, residents, applicants, colleagues and business partners confidential.

Examples of confidential and proprietary information include but are not limited to; financial and personal data of residents and employees; personal contact information of residents, applicants, and employees; company financial data; and information regarding our business partners.

If, over the course of employment, an employee acquires confidential or proprietary information about Bellwether, its employees, its residents, applicants, business partners and other business associates, such information is to be handled in strict confidence and is not to be discussed with non-company employees or employees of Bellwether that do not have a legitimate business reason to acquire the information.

Breaks in confidentiality are taken seriously and will be investigated in a timely and thorough manner. Any discovery of a break during the investigation may lead to course corrections up to and including termination.

Conflict of Interest

Bellwether employees should avoid situations that could present a conflict of interest, either real or perceived, with their position at Bellwether. A "conflict of interest" is a situation in which an employee has a private or personal interest that influences, or appears to influence, decision-making while performing their official duties at Bellwether. Below are examples of some activities from which a conflict of interest could arise:

- Use of privileged or confidential information, such as resident or employee data, etc. obtained or learned through working at Bellwether to further a personal interest.
- Gaining personal benefit through the awarding of contracts and/or selection of vendors and service providers while purchasing goods and services for Bellwether.

- Employment held in addition to a position with Bellwether that would be in direct competition with Bellwether or would have a negative effect on the quality of the employee's work for Bellwether.

Questions as to whether an activity or relationship could create a real or apparent conflict of interest in connection with employment at Bellwether should be promptly discussed with the People Leader and Human Resources leadership. Instances of Conflicts of Interest are taken very seriously and may lead to course corrections up to and including termination.

Employee & Resident / Client Relationships

Bellwether employees are urged to be aware that a personal friendship or relationship with a resident or other client in Bellwether-operated buildings may create the appearance of a conflict-of-interest issue in their work.

Employees living at a Bellwether property are particularly vulnerable to being accused of alleged bias when they have such a relationship with a resident in the building they manage. In addition, if the relationship becomes strained or negative, the employee is then vulnerable to accusations of alleged unfair treatment that, even if unfounded, can be difficult to defend; this also applies to employees working but not living on-site.

For these reasons, Bellwether strongly advises against personal friendships or relationships between employees and residents or other Bellwether clients, especially with said people that reside at the same property that the Bellwether employee lives and or works at. The employee has personal liability for any claims of impropriety and Bellwether does not assume any liability for employees that enter such relationships.

Questions as to whether an activity or relationship could create a negative impact in connection with employment at Bellwether should be promptly discussed with the People Leader and Human Resources leadership. Instances of Employee & Resident/Client Relationships are taken very seriously. Property Management team members should also refer to the Operations Manual for guidance. If a negative impact occurs based upon an employee and resident/client relationship, course corrections up to and including termination may be taken.

Solicitation

Bellwether employees may not solicit other Bellwether employees for any organization, product, or service during the working time of either employee. Bellwether employees may not distribute non-Bellwether material of any kind during work time or in work areas without written permission by the Human Resources Manager.

Exceptions to this policy is placing such material (Girl Scout cookie sales, Campfire candy sales, Boy Scouts popcorn sales etc.) in the Bellwether Administrative Office kitchens, shared copy rooms and Information bulletin boards within the Bellwether offices within the residential properties. Bellwether employees may not solicit or distribute non-Bellwether business related literature to residents of Bellwether buildings at any time.

Gifts, Favors, and Payments

Gifts, favors, and payments may be given to others at Bellwether's expense if they are:

- Consistent with accepted business practices and ethical standards.
- In a form that will not be construed as a bribe or payoff; **and**
- Public disclosure of the facts would not reflect poorly on Bellwether.
- Gifts in the form of a donation to the Bellwether Housing organization overall does not fall under this guideline and is welcomed and acceptable

Employees cannot seek nor accept gifts, favors, entertainment, or payouts for themselves or others, without a legitimate business purpose for acquiring such items. This excludes common courtesies usually associated with customary business practices such as:

- Lunch or dinner with vendors, sometimes including spouses/partners if the invitation is extended by the vendor.
- Gifts of small value from vendors, such as calendars, pens, pads, etc.
- Gifts of perishable items usually given during the holidays, such as cookies, nuts, popcorn, etc.
- Tickets to events (sports, arts, etc.) if the employee does not solicit such items.

Site Managers, Facilities Management employees, and Resident Coordinators working in our residential buildings are occasionally offered food as a gesture of hospitality and gratitude. While we prefer that Bellwether employees politely refuse offers of food, we recognize that some residents are persistent in their offers and would be offended by a refusal. In those circumstances, employees may accept small, non-alcoholic food items and beverages from residents as a sign of goodwill. Site Managers should report such gifts to their Portfolio Manager; Facilities Management employees should report these gifts to their People Leader. In no case should an employee give the impression of owing a favor to the resident or feel that a favor is owed. Fair housing laws require us to treat all residents equally.

Whistleblower Policy

Bellwether's Standards of Business Ethics requires employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Bellwether, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. We encourage any employee to bring forward concerns to their People Leader, Director, a Bellwether Leadership Member or Human Resources Leadership.

However, if you do not feel comfortable doing so, Bellwether utilizes a third-party vendor, Ethics Point, for employees to report concerns of any nature in an anonymous and confidential manner.

Ethics Point Help Line

1-844-936-2718 (open 24/7 toll-free)

Or bellwetherhousing.ethicspoint.com (Select Make a Report in the navigation bar at the top of the screen.)

The Ethics Point helpline has Relationship Managers who speak many languages, and the website also offers multi-linguistic services. When you call the Helpline, a Relationship Manager will transcribe your report and assign it to the appropriate person within Bellwether. All reports will be reviewed and acknowledged within 72 hours. Depending on that nature of the concern, additional time may be required to resolve the issue.

Retaliation

No employee who, in good faith, reports a potential violation, or complaint of any sort will suffer harassment, retaliation, or adverse employment consequence. Bellwether does not tolerate an environment of retaliation. An employee who retaliates against someone who has reported a violation in good faith is subject to course corrections up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within Bellwether prior to seeking resolution outside the organization. Should an employee believe they have been subjected to harassment or retaliation based on the above, please reach out their People Leader, Director, a Bellwether Leadership Member or Human Resources Leadership.

However, if you do not feel comfortable doing so, Bellwether utilizes a third-party vendor, Ethics Point, for employees to report concerns of any nature in an anonymous and confidential manner.

Ethics Point Helpline

1-844-936-2718 (open 24/7 toll-free)

Or bellwetherhousing.ethicspoint.com (Select Make a Report in the navigation bar at the top of the screen.)

Reporting Violations and or Complaints

Bellwether is committed to an open-door policy and encourages employees to share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's People Leader is in the best position to address concerns. However, if an employee is not comfortable speaking with their People Leader or are not satisfied with their People Leader's response, they are encouraged to speak with Human Resources or anyone on the Leadership Team they are comfortable approaching.

People Leaders are required to report suspected violations of the Standards of Business Ethics to Human Resources. Human Resources has specific and exclusive responsibility to investigate all reported violations. If you suspect fraud, if you are uncomfortable with Bellwether's open-door policy, or if you are dissatisfied with that policy, you should contact Human Resources.

However, if you do not feel comfortable doing so, Bellwether utilizes a third-party vendor, Ethics Point, for employees to report concerns of any nature in an anonymous and confidential manner.

Ethics Point Helpline

1-844-936-2718 (open 24/7 toll-free)

Or bellwetherhousing.ethicspoint.com (Select Make a Report in the navigation bar at the top of the screen.)

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the conduct. Any allegations that prove to be unsubstantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense and may result in course corrections up to termination of employment.

Accounting and Auditing Matters

The Finance and Audit Committee of the Board of Directors will address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Director of People & Culture will immediately notify the Finance and Audit Committee of any such complaint and work with the committee until the matter is resolved.

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Performance Reviews

All employees will have an annual performance review with their People Leader. The performance review is meant to support open, productive, and constructive dialogue between the People Leader and the employee. This is an opportunity to acknowledge and celebrate accomplishments, identify opportunities, set goals and identify areas needing additional focus.

Both parties should review performance, measure progress toward previously set goals and establish a new or revised set of attainable goals for the upcoming year.

The Bellwether Annual Performance Review Period begins during Q4 and both the People Leader and the employee share responsibility for the reviews.

Employees and People Leaders should meet on a consistent basis throughout the year to review progress toward the employee's goals leading up to the annual performance review. Interim performance reviews and/or performance course correction reviews may be initiated if warranted. Employees who do not receive a performance review within the timeframe announced each year should reach out to Human Resources for assistance.

Course Correction

Bellwether may set a course correction when a People Leader determines an employee's performance is not meeting expectations, has violated policies or procedures and/or when an employee exhibits inappropriate conduct in the workplace.

Bellwether may apply course correction it considers appropriate under all the facts and circumstances, up to and including immediate termination without prior action or notice. Course correction may include any of the steps below:

- **Verbal Discussion** – Verbal counseling involves the employee's immediate People Leader verbally informing the employee of the issue and the course correction that is expected. A verbal discussion may be documented in writing for the employee's file.
- **Written Warning** – A written warning is a more serious attempt at correction and is included in the employee's file.
- **Course Correction Expectations** – A documented course correction is a document that outlines specific expectations and objectives to immediately act upon to course correct. Failure to meet the goals outlined on a consistent and self-sustained basis often results in termination of employment.
- **Final Warning** – A final warning is written notice to an employee that if the issues identified are not corrected immediately and sustained in the immediate short term, their employment will be terminated.
- **Suspension** – Suspension is used in situations where an investigation or additional fact-finding is needed, and it is inappropriate for the employee to be working until the issue is resolved. Suspension may be paid or unpaid depending on the circumstances. The decision to suspend an employee lies with the immediate People Director, in consultation with the Human Resources Manager or the Director of People & Culture. Exempt employees will not be subject to an unpaid suspension except in increments of a full work week, as required by law.
- **Involuntary Separation (Termination)** – An employee's employment may be terminated by the employee's immediate People Leader with the concurrence of the department Director, or their designee, and the Human Resources Manager.

Conflict Resolution

Bellwether believes that serious, work-related conflicts should be reviewed openly and fairly. This is typically best accomplished through the following conflict resolution procedure:

The employee should discuss the matter with their immediate People Leader. The immediate People Leader is responsible for providing coaching and ideas of ways to resolve the conflict. If the complaint involves the employee's People Leader, the employee should schedule an appointment with their People Leader's People Leader to discuss the issue.

After an employee has met with their immediate People Leader to express their concerns, it may be most appropriate for the employee to attempt to resolve the conflict with the other party directly. There are instances where this is not the best course of action.

If the discussion with the immediate People Leader does not resolve the problem to the mutual satisfaction of the employee and the People Leader, or if the People Leader does not respond to the employee, the employee should contact the department Director to assist with resolving the conflict. Employees may request assistance with articulating their concerns from Human Resources. The department Director is responsible for informing the Human Resources Manager or the Director of People & Culture of conflicts that were not resolved satisfactorily at the immediate People Leader level.

If an employee is not satisfied with the outcome or decisions made by the department Director, they may escalate their concerns to the Director of People & Culture who will then review the issue and assist the parties in resolving the conflict. Generally, once the conflict has been elevated to the Director of People & Culture, they are considered the final decision-maker related to the conflict. In very rare instances, the conflict may be escalated to the Chief Operating Officer.

Once a conflict is resolved, the parties involved should monitor progress closely to make sure the resolution of the conflict is sustained.

Voluntary Separation of Employment

To voluntarily terminate their employment with Bellwether, an employee must notify their immediate People Leader and Human Resources in writing at least two weeks in advance of their intended separation date.

Failure to provide two weeks' notice may result in forfeiture of accrued PTO. If the termination date occurs halfway through a pay period, the employee will receive half of their PTO accrual for that pay period. To receive payout of PTO for the pay period in which the resignation occurs, Bellwether expects that a terminating employee will work the entire time designated by their notice or an agreed upon length of time as designated by Bellwether. Bellwether reserves the right to shorten the notice period for any reason. In these instances, the employee will receive payout of their accrued PTO since the shorter notice period was determined by Bellwether.

Following receipt of written notice, the employee's People Leader is responsible for notifying the department Director and the Human Resources Manager.

The immediate People Leader and employee are responsible for ensuring Bellwether has the information it needs to maintain efficient and effective operations and that Bellwether property is returned prior to separation. The immediate People Leader may assign the employee tasks to prepare for their exit (e.g., provide a list of all work in progress, document standard operating procedures, get caught up on all document retention activities).

Human Resources is responsible for initiating offboarding activities including but not limited to scheduling an exit interview with the employee and Human Resources, preparing employment separation documents, and coordinating deactivation of access and accounts with IT.

Below are only two examples in which Bellwether may end a person's employment involuntarily.

- Bellwether may act to eliminate (reduction in force) or restructure (repurpose) a position in the organization resulting in the involuntary separation of a person's employment. In these instances, Bellwether typically provides the employee with two weeks prior written notice or two weeks' pay in lieu of notice and PTO payout.
- Employment termination for cause, as determined by Bellwether, may occur immediately and will result in no PTO payout.

As an “at will” employer in an “at-will” state, Bellwether retains the right to terminate a person’s employment with or without cause, with or without notice, and with or without severance pay.

Employees leaving Bellwether must return all Bellwether property, including keys, prior to employment separation to be eligible for payment of accrued PTO leave. Any Bellwether property that is unreturned or is inoperable upon return, is subject to deduction of the employees’ final paycheck based upon the value to replace the equipment. If the final paycheck does not cover the full equipment value, the individual will be invoiced for the expense with payment due within 30-days of their separation date.

Failure to pay may result in the account being sold to a third-party collection agency.

Severance Guidelines

Severance may be offered in the following circumstances:

- Voluntary resignation in lieu of involuntary termination.
- RIF (reduction in force), lay off (position eliminated) or position being expanded or enhanced resulting in the employee no longer qualifying for the role.

Severance is not offered in instances of:

- Job abandonment
- Gross misconduct
- Involuntary termination due to: theft, violence in the workplace, misappropriation of funds, performance, inappropriate and verbal threats to one’s safety or the workplace.

Severance is conditional on the Bellwether employee signing a release, separation/severance agreement within the specified time-frame. Human Resources is responsible for ensuring that the process is compliant. The Director of People and Culture, Chief Executive Officer, or the Chief Operating Officer has discretion to determine if an employee is eligible for severance.

Employee Files and Disclosure

Once an employee has been hired, Bellwether creates an employee record. This file holds all relevant employment information such as employment applications, performance reviews, salary history, benefits, records of promotions, training records, attendance, as well as any other changes in job status not required to be maintained in a separate file by federal or Washington state law.

Bellwether’s employee records policy is to, as much as reasonably possible:

- Protect employee information from unauthorized disclosure.
- Limit the access of any specific information to those who need the information to perform their jobs.
- Provide employees with reasonable access to their own employee data records.

This employee record is stored electronically. Any employee wishing to review the contents of their employee file may do so by appointment with the Human Resources. They will be able to review the contents of their file under the supervision of a Human Resources team member. At no point is an employee allowed to remove contents or make copies from their file. Employees who believe that information contained in their employee file is erroneous or irrelevant may submit a written statement of their position, which will be added to the employee file.

Employees should keep Human Resources informed of all activities and accomplishments that affect the employee’s file including, but not limited to, changes in home address, telephone

number, emergency contact information, marital status, or the status of the employee's dependents as it relates to healthcare coverage and/or life insurance beneficiaries.

The employee should be aware that falsification of employee records, including the employment application form, may be cause for disciplinary action up to and including termination of employment.

Release of Employment Information

From time to time, current and former employees may request that information regarding their employment with Bellwether be released to third parties unaffiliated with Bellwether for the purposes of employment verification and references. It is important that the responses to these requests be accurate, and that the right to privacy and confidentiality of the information is maintained. For these reasons, all requests for employee information will be handled as follows:

- All requests for information regarding current and/or former employees should be made in writing and referred to Human Resources. No employee other than Human Resources should respond to such requests, unless otherwise directed by Human Resources. If necessary, Human Resources will coordinate with the People Leader.
- Employment verification via telephone will be limited to employee's date of hire, separation date, and position title. Additional employee information may only be released after Human Resources receives and reviews a written and signed request by the employee. An employee or former employee may obtain a Release of Information
- discretion.
- Upon termination or resignation, the employee will be provided an optional Release of Employment Information Authorization form.

Use of Bellwether-Owned Resources

Bellwether resources include, but are not limited to, company-issued credit cards, smartphones, tablets, building master keys, computer hardware including laptops, desktops, and monitors, software, cameras, vehicles, etc. Any additional costs incurred for loss or damage to Bellwether-owned resources will be the responsibility of the employee if:

- The resource(s) was entrusted to the employee at the time the loss/damage occurred; **and**
- The loss/damage was due to the employee's negligence, including but not limited to, leaving assets in an unlocked vehicle, unattended in public places, loaning out to family or friends, and being careless while consuming liquids near or while working with an asset.

Company Vehicle Use

Only qualified and authorized employees are permitted to use company vehicles. To qualify, you must have a valid driver's license and a clean Motor Vehicle Report with no convictions in the past 3-years (full requirements are listed in Section 1).

If you are authorized to use a company vehicle, you are expected to comply with all traffic laws and regulations. The driver and all passengers must wear seatbelts. Smoking is not permitted in any company vehicle.

If you are involved in an accident or experience vandalism, theft, or damage of company property when using a company vehicle, you must notify your People Leader immediately and submit a copy of the reporting agency's accident form (police report) within 24 hours of the incident.

Employees are not permitted under any circumstances to operate a company vehicle while impaired. Company vehicles may not be operated by anyone who has consumed drugs or alcohol.

Should you receive a parking or traffic citation, you must notify your People Leader and Human Resources, and you will be personally responsible for all fines, court costs, etc.

Bellwether will check the motor vehicle records for all current employees who drive a company vehicle on an annual basis. Any employee without a valid driver's license or satisfactory driving record will not be allowed to operate a company vehicle. If driving is an essential job function and the employee cannot be accommodated, the employee may be terminated.

Course corrections, up to and including termination of employment, may result from the careless, unsafe, illegal, or improper use or operation of Bellwether vehicles.

Personal Vehicle Use

If you operate your personal vehicle on company business, you must have a valid driver's license. Bellwether will reimburse you when you use your personal vehicle on company business at a per mile rate determined by the IRS. Reimbursement is meant to cover all operating expenses including insurance. The costs of any accident, vandalism, or theft that might occur during company business are borne by your personal insurance coverage.

If you are involved in an accident or experience vandalism, theft, or damage of company property while using your personal vehicle on company business, you must notify your People Leader and Human Resources immediately and submit a copy of the reporting agency's accident form (police report) within 24 hours of the incident.

When on company business, employees are not permitted under any circumstances to operate a personal vehicle if impaired.

Should you receive a parking or traffic citation, you will be personally responsible for all fines, court costs, etc.

If you violate this policy or fail to notify Human Resources that your license is revoked or suspended, your employment may be terminated.

Bellwether Issued Smartphones and Tablets

Where business needs demand immediate access to an employee, Bellwether may issue a smartphone, or tablet to an employee for work-related communications. Telephone logs may be audited on a random basis to confirm that no unauthorized use has occurred.

Employees will be offered one of two options:

- Have a Bellwether owned Smartphone provided to them
- Receive a \$60 per month stipend towards the cost of having their own Smartphone

Employees may be charged for unauthorized, excessive use of airtime and/or data usage as the plans are not unlimited.

Employees in possession of company equipment such as cell phones, smartphones, tablets, and accessories are expected to protect the equipment from loss, damage or theft. They will be liable to pay for repair or replacement costs if their negligence causes the loss or damage. Upon voluntary or involuntary separation, the individual is expected to return the smart phone and or tablet. Additionally, at any time during employment, the employee may be asked to produce the telephone for return or inspection.

Safety Issues for Telephone Use

Employees whose job responsibilities include driving are expected to refrain from using a mobile device while driving. Regardless of the circumstances, including slow or stopped traffic, employees are to pull off to the side of the road and safely stop the vehicle before placing or

accepting a call. If acceptance of a call is unavoidable and pulling over is not an option, employees are expected to keep the call short, use hands-free options, refrain from discussion of complicated or emotional issues, and keep their eyes on the road. Special care should be taken in situations where there is traffic, inclement weather, or the employee is driving in an unfamiliar area.

Employees whose job responsibilities do not specifically include driving as an essential function, but who are issued a mobile device for business use, are also expected to abide by the provisions above. Under no circumstances are employees allowed to place themselves at risk to fulfill business needs.

Employees who are charged with traffic violations or are involved in accidents resulting from the use of a cellular telephone or smartphone while driving will be solely responsible for all liabilities that result from such actions. Violations of this policy will be subject to the highest forms of course corrections, up to and including termination of employment.

On-Call Expectation for Positions as defined by Department Directors

When an employee is on duty and carrying a Bellwether smartphone, they are expected to have the battery charged, the ringer turned to an audible level, the telephone on, and to answer the telephone promptly. Site Managers should forward the office telephone to their cellular telephones when out of the office.

Transportation and Commuter Policies

Bellwether encourages the use of public transportation to contribute to environmental sustainability and reduce traffic. Employees who commute to work by bus, train, or ferry receive reimbursement equivalent to the cost of a one-zone transit pass.

Employees who work on-site at our residential properties, have access to free parking on a first come, first serve basis. Employees who work in the Administrative Office 4+ days a week, are assigned spaces in the Bellwether garage. Bellwether employees that work less than 4 days a week in the office, will be able to schedule a parking spot for the day on a first come, first serve basis. Facilities Management employees use the small parking lot next to the BellOlive Apartments. Building employees may be provided free spaces at the buildings where they work if spaces are available. Parking spaces in a Bellwether garage will be assigned based on the following criteria in priority order:

- The need to use a vehicle during the day to complete work assignments, or
- There is no reasonable alternative to driving to work, or
- On a first-come, first-served basis (we maintain a waiting list for parking spaces that become available in the future)

If no spaces are available in the Bellwether garage, employees will receive a one-zone bus pass, or they may be assigned a tenant parking space if one is available. If no parking spaces are available, then the employee receives the equivalent of a one-zone bus pass and they are placed on a waiting list for the next available parking space.

There may be some circumstances when an employee who parks in the garage may be asked to give up their parking space to someone with a higher need to park. An example would be a new employee who requires a vehicle to perform their job. This employee might be provided the space of an employee who has another reasonable means of transportation and has a parking space based on seniority only. The employee who must give up the parking space would be given the equivalent of a one-zone bus pass.

Additionally, bike commuting is encouraged and bike storage is offered where available on a first come, first serve basis.

Bellwether's Communication Systems

Bellwether's communications systems (email, voicemail, telephones, smartphones, computers, computer network, tablets, fax machines, etc.), and all communication and information transmitted by, received from, or stored in these systems, are the property of Bellwether. Bellwether may access, use, review or monitor any of its systems or communications over those systems at any time. Monitoring employee activity on these systems is not a general Bellwether practice but may be conducted if concerns about misuse of these systems arise. **Employees should not have personal privacy expectations in relation to their use of these Bellwether systems.**

Bellwether systems are to be used primarily for job-related purposes. Use of these systems other than for business purposes are to be kept to a minimum and must not interfere with job responsibilities. These guidelines also apply to online social networking and blogging activities on social media sites, such as Facebook, Twitter, LinkedIn, TikTok, Snapchat, Tumblr, Reddit, and Instagram.

The following guidelines apply to all use of Bellwether's communication systems:

No media advertisement, internet home page, electronic bulletin board posting, or any other public representation of Bellwether or on behalf of Bellwether may be issued unless Bellwether's Director of Communications has first approved it. Building vacancy marketing may be posted under the supervision of the Site Managers.

No information of a confidential, sensitive, or otherwise proprietary nature may be placed or posted on the Internet, including social networking, and blogging sites, without prior approval from Bellwether's Director of Communications.

Email must not be used in ways that are disruptive or offensive to others, or in ways that are inconsistent with the professional image of Bellwether. Accessing, distributing, or forwarding messages for personal or entertainment purposes unrelated to work activities must be kept to a minimum (i.e., jokes, pictures, etc.).

Display or transmission of sexually explicit images, messages, cartoons, or any communication that can be construed as harassing, defaming or disparaging of others based on their race, national origin, sex, age, disability, or other legally protected characteristic is strictly prohibited.

Websites of a political nature unrelated to Bellwether's mission or websites of a sexual nature are not to be accessed using Bellwether's network system or equipment.

Any use of email to solicit outside business ventures, to leak confidential, sensitive, or proprietary information, or for any other inappropriate purpose, is prohibited and course corrections may be taken up to and including termination.

Only Bellwether IT administration employees can download software or programs, install hardware, or access limiting programs of any type in modification of existing Bellwether systems. Only document files can be downloaded from the Internet. Downloading music or other copyrighted material through file sharing software, is prohibited due to the risks of virus infection of our computer system and legal risks to Bellwether. If uncertain whether virus-checking software is current, employees must check with our Information Technology team. Bellwether reserves the right to audit any work computer at any time for unapproved software.

Bellwether employees are prohibited from using Bellwether systems to gather or distribute software, information, or programs in violation of copyright or system access laws and are personally liable for compliance with such copyright, system access, use and privacy laws. In addition, Bellwether's logo and other identifying marks or copyright-protected material may not

be posted online at social networking and blogging sites without permission from the Director of Communications. If uncertain about copyright laws, contact the Director of Information Technology.

The Bellwether communication systems may not be used to solicit or address others regarding personal, commercial, religious, or political causes, or for any other solicitations that are not Bellwether work related, except as approved by management.

Unauthorized use of Bellwether communication systems includes, but is not limited to posting, or downloading pornographic material; engaging in computer “hacking” and other related activities; attempting to disable or compromise the security of information contained on Bellwether’s computers; subscribing to news groups and mailing lists without a work-related purpose.

Employees shall not share a password, provide access to an unauthorized user, or access another user’s email, workstation or voicemail box without expressed written authorization.

Bellwether allows employees non-commercial, limited personal use of Bellwether computers and internet access within the guidelines above on their personal time as approved by their People Leader.

All employees are personally accountable for messages that they create or forward using Bellwether electronic or telecommunications systems. Misrepresenting, obscuring, suppressing, or replacing a user’s identity on an electronic communication is prohibited. Any violation of this policy will result in appropriate disciplinary action, up to and including termination of employment, and the exercise of other legal remedies that may be available to Bellwether.

Bellwether Social Media Policy

The above guidelines also apply to online social networking and blogging activities on social media sites, such as Facebook, Twitter, LinkedIn, TikTok, Snapchat, Tumblr, Reddit, and Instagram.

Employees are personally responsible for the commentary they express and the material they post while engaging in online social networking and blogging activities. Employees must make it clear that the views and opinions they express about work-related matters are their own and do not necessarily represent the views and opinions of Bellwether.

Employees are welcome to follow Bellwether Housing’s social media accounts. Bellwether Housing’s social media accounts will not follow employee’s social media accounts.

Representation of Bellwether Housing to the Media and Public

In order to maintain Bellwether’s public image, employees may not make statements or comments to the media or to the public about Bellwether policies and positions on issues or political events. Any requests from the media or for public statements should be referred to the Bellwether Chief Executive Officer or Director of Communications. Other Bellwether employees should limit their representation of Bellwether to performing assigned duties. Employees may not use Bellwether letterhead or position titles when making personal comments or statements to the public or media.

Visitors in the Workplace

Bellwether’s goal is to provide a welcoming, positive, safe, and productive work environment for all employees. Employees are expected to participate in achieving this goal, and to conduct themselves accordingly during work hours. Employees should participate in creating productive work environment by limiting visits of family members and friends to Bellwether work areas during business hours.

The employee’s People Leader must approve routine and recurrent visits by family members or friends. “Recurrent” is defined as occurring at frequent, regular, and predictable intervals. People

Leaders will determine whether a request for a recurring visit is allowed based on an employee's job description and responsibilities. If a request is approved, it is the employee's responsibility to make sure that their visitor is not disruptive to the work environment for other Bellwether employees. Any disruption caused by a visitor should be communicated to the People Leader of the employee.

Section 4: Safety Policies

Safety Overview

Bellwether's goal is to protect the personal health and safety of each employee. Bellwether safety program is meant to prevent occupational injury and illness, minimize or eliminate hazardous conditions, and observe all applicable Washington state and federal safety requirements.

Bellwether will offer relevant safety orientation for all employees. Depending on an employee's job responsibilities, this orientation may include how to handle chemicals, correct and safe use of equipment, and what to do in emergency situations (CPR, first aid, etc.). Employees will observe basic safety procedures for themselves, their co-workers, building residents and contracted service employees. Employees must immediately report any identified safety hazards to either the Bellwether Safety Program Manager, their People Leader, and Human Resources.

On-the-Job Injuries or Illness

Bellwether follows Industrial Insurance Law of Washington and is certified as an insured policyholder with the State Industrial Insurance Fund, also known as "L&I" or "Worker's Compensation." All eligible employees are covered by Worker's Compensation for on-the-job injuries or illness. This insurance provides compensation for lost time, medical expenses, surgical expenses, and the loss of life or dismemberment from injury or illness arising out of or in the course of a job assignment with Bellwether. To protect employees' coverage of work-related injury or illness and to provide timely information to the insurance carrier, employees must follow these guidelines:

- All injuries or illnesses must be reported immediately to the employee's direct People Leader, Bellwether's Safety Program Manager and Human Resources.
- A Bellwether Accident & Incident Report form must also be completed within 24 hours following the occurrence of the injury or onset of illness (when feasible) and submitted to the employee's direct People Leader. A copy of the report will be provided to Bellwether's Safety Program Manager and Human Resources.
- The employee should inform the treating physician that the injury or illness is job related.
- The employee must complete the worker's section of the "L&I Accident Report." This form is available at the doctor's office.
- If you need help navigating L&I procedures, please contact Human Resources.

Policy on Drug and Alcohol Use While on Duty

No employee shall report to work or perform work while impaired by any lawful or unlawful substance, drug or alcohol. "Impaired" means under the influence of a substance such that the employee's motor senses, i.e., sight, hearing, balance, reaction, reflex or judgment may be reasonably presumed to be affected. Such drug or alcohol usage will not be tolerated and may be grounds for immediate termination.

While present at any Bellwether building or work site, employees will not possess, use, or be intoxicated using any substance or drug. "Possess" means having either in or on an employee's person, personal effects, motor vehicle, and area substantially entrusted to the control of the

employee, to include apartment units occupied by Bellwether employees. For all purposes, the use of a company-owned vehicle shall be considered company premises and these rules shall apply.

Bellwether reserves the right to refer any employee to test for drug or alcohol use if there is reasonable suspicion that this policy has been violated.

Smoking Policy

The Clean Air Act, effective January 1, 2006, amends the Revised Code of Washington (RCW) regulations regarding smoking. This Act recognizes the serious health risks posed by second-hand smoke and states: "citizens are often exposed to second-hand smoke in the workplace, and are likely to develop chronic, potentially fatal diseases as a result of such exposure."

The Act prohibits smoking in public spaces, including work sites, and prohibits smoking within 25 feet of building entrances and exits, windows that open, and ventilation intakes that serve an enclosed area where smoking is prohibited. In accordance with this law, Bellwether does not allow smoking, e-cigarettes or vaping in our office areas or connected spaces and work areas. This prohibition applies to all work sites, including administrative offices, rental offices, and the Facilities Management office and shop.

Bellwether residential apartment buildings are entirely "smoke free," and no smoking is allowed within any building or within 25 feet of any buildings.

Harassment Free Workplace

Bellwether is committed to providing a work environment that is unequivocal in its anti-racist stance and maintains equality, dignity, and respect for all employees. In keeping with this policy, harassment of any type, including harassment based on race, color, creed, religion, sex, age, national origin, ancestry, marital status, veteran or current military status, sensory, physical, or mental disability, use of a service animal, sexual orientation, gender, gender identity, gender expression, political ideology, or any other protected status is a violation of company policy and is strictly prohibited. While the following types of specific behavior may not necessarily constitute harassment, they are prohibited at Bellwether: slurs, graffiti, negative stereotyping, racial, ethnic, or religious epithets, and written or graphic material that show hostility to an individual or group. This is not an exclusive list of behaviors that may violate this policy.

This policy applies to harassment by Bellwether Leadership Team members, People Leaders, co-workers, clients, vendors, or anyone with whom an employee comes into contact as part of that employee's job. Bellwether expects its employees, clients, vendors, and business visitors to always act appropriately and responsibly to maintain a safe, cooperative working environment free from discrimination and harassment of any kind. Any employee engaging in such harassment will be subject to appropriate disciplinary action up to and including termination.

Sexual Harassment and Sexual Misconduct

Sexual harassment is against the law and Bellwether will not tolerate it in our workplace. **Sexual harassment is a crime.**

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. Sexual harassment can consist of unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature or that is otherwise based on sex, gender, gender identity, or gender expression when:

- Subjection to such conduct is made either explicitly or implicitly as a condition of an individual's employment; **and/or**

- Subjection to or rejection of such conduct is used as a basis for making employment decisions affecting the individual, such as hiring, firing, pay increases, promotions, transfers, etc.; **and/or**
- Such conduct – **intentionally or unintentionally** – interferes with an employee’s work performance, or creates an intimidating, hostile or offensive working environment.

Any conduct that meets the above definition is prohibited at Bellwether. This expressly includes explicitly or implicitly conditioning any term of employment (such as continued employment, wages, evaluation, advancement, time off, assigned duties, or shifts) on the provision of sexual favors.

Sexual harassment may be difficult to recognize in certain circumstances and may include:

- Linking demands for sexual favors to any employment decisions, favorable evaluations, assignments, or promotions.
- Verbal behavior such as offensive remarks, epithets, slurs, stereotyping, or unwelcome jokes; sexual suggestions, or comments of a sexually explicit or derogatory nature; verbal abuse; pressure for sexual favors; commenting in a sexually suggestive manner about an individual’s physical appearance; sexually-oriented “kidding” or “teasing;” asking questions about an individual’s sexual conduct, orientation, or preferences; continuing to ask a person on a date when that person has indicated that they are not interested.
- Non-verbal behavior such as displaying or distributing sexually suggestive or obscene pictures, pornography, cartoons, calendars, electronic, or written material; or suggestive looks, gestures, or leering.
- Physical behavior including touching or grabbing any part of any individual’s body; and making aggressive actions or threats to take such actions.
- **This is not an exclusive list of behaviors that may violate this policy.**

Any employee who experiences, witnesses, or learns of harassing conduct by another employee must report the conduct immediately. The conduct can be reported to any of the following persons: their People Leader, the department Director, a member of Human Resources, or a member of the Leadership Team.

The Human Resources department will investigate all reported incidents of harassment promptly and thoroughly as reasonably practicable. Retaliation will not be permitted against an employee who makes a good faith complaint, or who cooperates in good faith in an investigation. All complaints will be kept as confidential as possible, which means they will be disclosed only to witnesses and others as necessary to fully investigate and respond to the complaint, to management, and as may be required by law.

However, if you do not feel comfortable doing so, Bellwether utilizes a third-party vendor, Ethics Point, for employees to report concerns of any nature in an anonymous and confidential manner.

Ethics Point Helpline

1-844-936-2718 (open 24/7 toll-free)

Or bellwetherhousing.ethicspoint.com (Select Make a Report in the navigation bar at the top of the screen.)

Workplace Violence Policy

Bellwether will not tolerate workplace violence. Human Resources will investigate all acts or threats of violence.

The following list of behaviors, while not inclusive of all situations, provides examples of conduct that is prohibited and subject to immediate termination:

- Causing physical injury to another person, or any act or gesture **intended** to cause injury.
- Making threatening remarks.
- Aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to intimidation, harassment, micro-aggressions, or emotional distress as diagnosed by a healthcare provider.
- Intentionally damaging company owned or managed property or the property of a Bellwether employee, or any act or gesture likely to cause such damage.
- Existence or possession of guns, knives, or other weapons while at any Bellwether building, property, or work site, including weapons in personal vehicles.**
- Possession of a weapon while on company business.
- Committing acts motivated by, or related to, sexual harassment, or domestic violence.
- Carrying pepper spray, or like items for defensive purposes, does not violate this policy.

**This policy excludes lawfully owned, concealed and/or licensed weapons.

Reporting Procedures

Any employee who experiences or witnesses an act or threat of violence or a potentially dangerous situation is asked to immediately report the incident to a People Leader, Human Resources, or a member of the Leadership Team.

However, if you do not feel comfortable doing so, Bellwether utilizes a third-party vendor, Ethics Point, for employees to report concerns of any nature in an anonymous and confidential manner.

Ethics Point Helpline

1-844-936-2718 (open 24/7 toll-free) Or visit bellwetherhousing.ethicspoint.com (Select Make a Report in the navigation bar at the top of the screen.)

Risk Reduction Measures

Bellwether implements the following risk reduction measures to mitigate workplace violence:

- **Hiring** – Bellwether and Human Resources takes reasonable measures to review candidates' employment background to reduce the risk of hiring individuals with a history of violent behavior.
- **Safety** – Bellwether conducts periodic inspections of the premises to evaluate and determine any vulnerability to workplace violence or hazards.
- **Individual Situations** – Employees are expected to exercise good judgment and to inform a People Leader, Human Resources, or a member of Leadership Team if any employee exhibits behavior that could be a sign of a potentially dangerous situation, including discussing or bringing weapons to the workplace; displaying overt signs of extreme stress, resentment, hostility or anger; making threatening remarks; sudden or significant deterioration of performance; or displaying irrational or inappropriate behavior.

Dangerous or Emergency Situations

Employees who confront or encounter an armed or dangerous person should not attempt to challenge or disarm the individual. Employees should try to remain calm, make constant eye contact, and talk to the individual. Emergency assistance (911) should be contacted immediately, unless doing so would put the employee or others in harm's way. If a People Leader can be safely notified of the situation without endangering the safety of the employee or others, such notice should be given. Cooperate and follow the instructions given by the armed or dangerous person.

Inclement Weather

In the event of inclement weather that disrupts employees' ability to be at work, Bellwether will adjust our plans to maintain operations. Since we operate rental housing, we are unable to "close" operations. Communication with Site Managers, Facilities Management employees, and residents is critical. Facilities Management requires at least minimal staffing during all business hours. Facilities Management employees will also maintain communication after hours with residents via the Emergency Facilities Management number provided below.

The Senior Maintenance Manager will make every effort to reach the Facilities Management Office, with the Maintenance Managers acting as their backups. In the event they are unable to reach the office, communication with the Senior Maintenance Manager will be through their cell phone at **(206) 730-1297**.

All employees who are expected to report to work on-site or to the Facilities Management office and anticipate being late for work or are unable to reach work due to weather conditions, should call their People Leader directly on their mobile phone. If employees have access to email, they can also send an email to their People Leader and the Leadership Team. During serious inclement weather, it is imperative that the Leadership Team knows who is at work and who is unable to arrive. The Leadership Team is responsible for responding to emergencies with our residents, buildings, and employees. In order to provide direction to employees, LT needs information about employee availability.

Arriving Safely at Work During Inclement Weather

- Employees will make the effort to arrive safely at work. It is up to employees to assess their situation and make appropriate decisions to protect their safety.
- During dangerous driving conditions, employees who can safely access public transportation should do so to get to work.
- Those who have the capability and approval to work remotely should do so.
- Those who are not able to use public transportation or other transportation they feel is safe should take PTO for the day(s) they are absent. Some employees can work remotely as an alternative and should check in with their People Leaders regarding that option.
- Building employees that are on site are expected to work normal hours, including additional paid hours if needed.
- Property Management employees will directly assist with building needs.
- Leadership Team members will make every effort to arrive at work to provide backup to the Facilities Management office and/or to direct employees.

Emergency Cell Phone Numbers

Bellwether Administration: (206) 623-0506

Bellwether Facilities Management: (206) 343-2048

Emergency 24 Hour Facilities Management: (206) 730-5064

Senior Maintenance Manager: (206) 730-1297

Section 5: Attendance Policies

Business Hours

Good attendance and punctuality are an essential part of Bellwether's ability to operate successfully. People Leaders should set clear expectations about the core hours for their team

based on business needs. Some departments will have resident facing business needs outside of the typical 8am -5pm workday.

Absenteeism and Tardiness

Unreported absences, excessive unexcused absenteeism, and/or recurring tardiness cause an excessive burden on other employees and reduce the quality of service to our clients. This conduct may result in disciplinary action up to and including termination of employment.

Reporting Absences

An employee unable to report to work should contact their People Leader directly whenever possible during the first 30 minutes of the workday. If an absence continues for more than one day, the People Leader should be notified during the first 30 minutes of each day unless prior arrangements have been made, or the employee is incapacitated or on an authorized extended medical leave.

Absence Without Notice/Job Abandonment

An employee absent from work for three full consecutive working days for an unreported, and unexcused, absence will be considered to have resigned their position and terminated employment with Bellwether.

Leaves of Absence

Bereavement

The bereavement leave policy provides an employee with up to five business days of paid leave per calendar year in the case of the death of a loved one. Bereavement leave does not rollover year to year. Loved ones include (all family members include step and in-laws):

- Parents
- Spouses, partners
- Children
- Grandparents
- Grandchildren
- Aunts, uncles, cousins
- Siblings
- Nieces, nephews, niblings (gender-neutral)
- Close friends
- Roommates
- Pets

Domestic Violence/Sexual Assault Leave

Domestic violence/sexual assault leave is available to employees who are experiencing domestic violence, sexual assault, or stalking. It is also available to employees with a family member (child, spouse, parent, parent-in-law, grandparent, or person with whom the employee has a dating relationship) who is experiencing of domestic violence, sexual assault, or stalking.

Leave may be taken in blocks of time off, or intermittently, and the amount of leave that an employee may take is restricted to an agreed upon amount of time between the People Director, People Leader and the employee. The law does not limit the duration of the leave to a specific time or length.

Domestic violence/sexual assault leave may be taken for any of the following reasons:

- To seek law enforcement or legal assistance, or to prepare for or participate in any legal proceeding related to domestic violence, sexual assault, or stalking.

- To seek health care treatment for physical or mental injuries from domestic violence, sexual assault, or stalking, or to attend to such health care treatment of a family member.
- To obtain (or assist a family member in obtaining) services from a domestic violence shelter, a rape crisis center, or other social services.
- To obtain (or assist a family member in obtaining) mental health counselling related to domestic violence, sexual assault, or stalking.
- To participate in safety planning, to temporarily or permanently relocate, or to take other actions to increase the safety of the employee or family member relating to domestic violence, sexual assault, or stalking.

You must provide notice of your need for leave no later than the end of the first day that the leave is taken. You may need to provide documentation to Bellwether to verify the need for leave, such as a medical note, police reports, court documents, or a written statement from you. You are not required to disclose further details about the situation to Bellwether.

Bellwether will hold all information and documentation related to the leave in the strictest confidence. We will not ask for additional details about the situation other than what is needed to verify the leave. The nature of your leave will only be disclosed to necessary parties.

If you or a loved one is experiencing domestic violence, sexual assault, or stalking, there is support and resources available. We strongly encourage you to let us know if you need DV/SA leave and will do whatever we can to support you.

Our Employee Assistance Program can help you find legal, medical, and other resources.

The King County Sexual Resource Center has a 24/7 resource line available at 888.99.VOICE (888.998.6423).

Family and Medical Leave Act (FMLA)

Bellwether follows federal and state family and medical leave laws. The Family and Medical Leave Act (FMLA) is a federal law designed to give you unpaid time away from work for the reasons listed below. FMLA applies to worksites that employ 50 or more employees within a 75-mile radius.

Reasons for FMLA

Employees who have worked for Bellwether for at least 12 months and at a minimum of 1,250 hours during the prior 12 months, may take unpaid leave for the following reasons:

- Birth and/or care of a child of the employee.
- Placement of a child into the employee's family by adoption or by a foster care arrangement.
- Care of the employee's spouse, domestic partner, child, or parent who has a health condition.
- Inability of the employee to perform the functions of the employee's position due to a serious health condition.
- A qualifying exigency arising out of the employee's spouse, child, or parent's covered active duty or call to active duty in the armed forces, which includes duty during the deployment of the service member to a foreign country.
- Care of the employee's spouse, child, parent, or next of kin (nearest blood relative) who has incurred an injury or illness or aggravated an existing injury or illness in the line of duty while on active duty in the armed forces for up to five years after their separation from military service, provided that such injury or illness may render the spouse, child,

parent, or next of kin medically unfit to perform duties of their office, grade, rank, or rating (“Caregiver Leave”).

An eligible employee is entitled to up to 12 weeks of unpaid FMLA leave in a 12-month period for reasons 1-5 above.

An eligible employee may take up to 26 weeks of unpaid FMLA leave during a single 12-month period to care for an injured or ill service member (“Caregiver Leave”; Reason 6). Caregiver Leave, when combined with other FMLA qualifying leave, may not exceed 26 weeks in a single 12-month period.

Calculation of Amount of FMLA Leave – Any FMLA leave taken by an employee during the preceding 12-month period will be used to determine the amount of available leave pursuant to the Family and Medical Leave Act for Reasons 1 through 5 above. For FMLA Caregiver Leave, the leave entitlement begins when the employee starts using their leave.

Serious health condition

A serious health condition is defined as a condition that requires hospitalization, at least overnight, or requires continuing treatment or involves a chronic illness. Conditions requiring continuing treatment qualify:

- If you are unable to work for three full days: and
- Require treatment by a health care provider two or more times; or
- Require treatment once with a regimen of continuing care under the supervision of a health care provider.
- Chronic conditions qualify if they:
 - Require periodic visits (at least twice per year) for treatment by a health care provider.
 - Continue over an extended period; and
 - May cause episodic rather than a continuing period of incapacity.

Birth, Care or Placement of Child

The right to FMLA leave for the birth, care, and/or placement of a child into an employee's family may only be taken within the 12 months after the date of the birth or placement of the child. In the case of unpaid leave for the birth, care or placement of a child, intermittent leave, or working a reduced number of hours, is not permitted unless both the employee and Bellwether agree.

Qualifying Exigency

FMLA leave may be used if an employee's spouse, child, or parent is on covered active duty or called to active-duty status in the armed forces. This includes duty during the deployment of the service member to a foreign country. Qualifying exigencies may include:

- Short-notice deployment (up to 7 days of leave).
- Attending certain military events.
- Arranging for alternative childcare.
- Addressing certain financial and legal arrangements.
- Periods of rest and recuperation for the service member (up to 5 days of leave).
- Attending certain counselling sessions.
- Attending post-deployment activities (available for up to 90 days after the termination of the covered service member's active-duty status).
- Other activities arising out of the service member's active duty or call to active duty and agreed upon by the company and the employee.

Spouses Working for Bellwether

If both spouses are employed by Bellwether, the combined leave for the birth, care and/or placement of a child, care for the employee's parent with a serious health condition, or due to a family member's call to active duty shall not exceed 12 weeks. The combined leave for spouses working for Bellwether is limited to 26 weeks for Caregiver Leave, or when Caregiver Leave is taken in combination with leave for the birth, care and/or placement of a child, care for the employee's parent, or due to a family member's call to active duty.

Caregiver Leave

For purposes of Caregiver Leave, next of kin is the nearest blood or relative by adoption or marriage, other than the covered service member's spouse, parent, son, or daughter, in the following order of priority:

- Blood relatives who have been granted legal custody of the service member by court decree or statutory provisions
- Named and designated legal guardians.
- Brothers and sisters
- Grandparents
- Aunts and uncles
- First cousins

If the covered service member has specifically designated in writing another blood relative as their nearest blood relative for purposes of Caregiver Leave, that family member will be deemed next of kin. In such circumstances, only that designated next of kin may take FMLA leave to care for the covered service member. When a covered service member does not make such a designation, and there are multiple family members with the same level or relationship to the covered service member, all such family members shall be considered the covered service member's next of kin.

Bellwether will require an employee to provide reasonable documentation of the family relationship.

Intermittent Leave

In the case of unpaid leave for serious health conditions, the leave may be taken intermittently, or on a reduced-hours basis, only if such leave is medically necessary. FMLA leave may also be taken intermittently, or on a reduced-hours basis, for reasons relating to a family member's Armed Forces active duty, or when an employee needs to care for a family member who has incurred an injury or illness while on active duty. Where an employee requests intermittent leave or leave on a reduced-hours schedule that is foreseeable based on planned medical treatment, Bellwether has the option, in its sole discretion, to require the employee to transfer to a temporary alternative job for which the employee is qualified and which better accommodates the intermittent leave or reduced hours leave than the employee's regular job. The temporary position will have equivalent pay and benefits as the employee's regular job.

Paid Leave and FMLA Leave

Employees are required to substitute accrued paid time off during the unpaid FMLA leave period. Employees who are receiving disability or workers' compensation benefits during their FMLA leave are not required but may elect to use their PTO time during the FMLA leave. That portion of the FMLA leave of absence which is PTO will be with pay according to Bellwether's policies regarding PTO leave. Employees who do not qualify for PTO leave will be entitled to unpaid FMLA leave.

Notification by Employee

When the necessity of leave is foreseeable due to the expected birth or placement of a child, the employee must provide Bellwether at least 30 days' notice of the employee's intention to take leave. If the date of birth or placement of a child requires the employee's leave to begin in less than 30 days from the date of notice to Bellwether, the employee must provide such notice as soon as practical.

Where the need for leave is for reasons relating to a family member's Armed Forces active duty and such leave is foreseeable, the employee must give notice as soon as is reasonable and practical. Bellwether may require that the employee provide a copy of the family member's active-duty orders or other reasonable documentation.

Where the necessity for leave is due to a family member's or an employee's own serious health condition, and is foreseeable based on planned medical treatment, the employee must:

Give at least 30 days' notice, or as soon as practical if treatment starts in less than 30 days; and

Consult with Bellwether and make a reasonable effort to schedule the treatment so as not to unduly disrupt the operation of Bellwether, subject to the approval of the health care provider.

Where the need for leave is unforeseeable, employees are required to follow Bellwether's established call-in procedures for calling in absences. Employees failing to give such notice will normally have their FMLA leave delayed or denied. When an employee seeks leave due to an FMLA-qualifying reason for which Bellwether has previously provided FMLA leave, the employee must specifically reference the FMLA qualifying reason when notifying Bellwether.

Any leave request based on a family member's serious health condition, including a covered service member, or an employee's own serious health condition must be supported by certification from a health care provider. The employee must provide a completed certification to Bellwether in a timely manner (fifteen calendar days will be allowed to provide the certification). Failure to provide the certification in a timely manner will result in denial of the leave until the certification is provided. Bellwether will notify the employee if the certification form is incomplete, and the employee will be given seven calendar days to cure the deficiency.

Once Bellwether has sufficient information to determine whether the leave is being taken for an FMLA-qualifying reason, the employee will be provided with a Designation Notice advising the employee whether the leave qualifies for FMLA leave. If the employee is not eligible for FMLA leave, the employee shall be informed of that fact.

If an employee files for disability or workers' compensation benefits, the employee must comply with the certification requirements of the disability or workers' compensation benefit plan. Employees who fail to meet the disability or workers' compensation certification requirements may not be eligible for those benefits. The employee will still be eligible for FMLA leave, provided the FMLA requirements have been satisfied.

Qualifying Exigency Certification

Each time an employee first requests leave for one of the qualifying exigencies, certification by the employee is required. The certification process will include, but may not be limited to, providing a copy of the covered military member's active-duty orders or other military documentation showing active-duty status or notification of an impending call to active duty.

Employee Benefits During FMLA Leaves of Absence

Bellwether will continue to pay its portion of the health insurance premiums and the employee, if applicable, must continue to pay their share of the premium. Failure of the employee to pay their share of the health insurance premium may result in loss of coverage. If the employee fails to

timely pay the employee's share of health insurance premium, the employee will have a grace period of 30 days. At least 15 days before the expiration of the grace period, Bellwether will mail a written notice to the employee informing the employee of the date the insurance will expire if the employee's share of the premium is not paid. Bellwether may, at its option, pay the employee's share of the premium and will recover that cost from the employee. If the employee does not return to work after the expiration of the leave, the employee will be required to reimburse Bellwether for payments of the health insurance premiums during the FMLA leave, unless the employee does not return because of the presence of a serious health condition of the employee or the employee's family member, or circumstances beyond the control of the employee.

Paid Family and Medical Leave

Paid Family and Medical Leave is a mandatory statewide insurance program that will provide almost every Washington employee with paid time off to give or receive care. If an employee qualifies, this program will allow them to take up to 12 weeks, as needed, if they:

Welcome a child into your family (through birth, adoption or foster placement).

Experience a serious illness or injury.

Need to care for a seriously ill or injured relative.

Need time to prepare for a family member's pre- and post-deployment activities, as well as time for childcare issues related to a family member's military deployment. For specifics on military-connected paid leave, visit www.dol.gov/whd/regs/compliance/whdfs28mc.pdf

If an employee faces multiple events in a year, they might be eligible to receive up to 16 weeks, and up to 18 weeks if they experience a serious health condition during pregnancy that results in incapacity.

Payment of Premiums

The program is funded by premiums paid by both employees and employers and is administered by the Employment Security Department (ESD).

Employers are responsible for paying about 37 percent of the premiums; the remaining 63 percent is withheld from employees' paychecks.

Washington State Paid Medical Leave & Paid Family Leave

Starting Jan. 1, 2020, employees who have worked 820 hours in the qualifying period (equal to 16 hours a week for a year at any employer) will be able to apply to take paid medical leave or paid family leave. The 820 hours are cumulative, regardless of the number of employers or jobs someone has during a year. All paid work over the course of the year counts toward the 820 hours, including part-time, seasonal, and temporary work.

While on leave, the employee is entitled to partial wage replacement. That means they will receive a portion of their average weekly pay with a minimum of \$100 per week and a maximum of \$1,000 per week depending on their hourly or salary rate. Employees can visit <https://paidleave.wa.gov/estimate-your-weekly-pay/> to determine their partial wage replacement. They will be paid by the Employment Security Department, not their employer.

Employees who return from leave under this law will be restored to a same or equivalent job if they work for an employer with 50 or more employees, have worked for this employer for at least 12 months, and have worked 1,250 hours in the 12 months before taking leave (about 24 hours per week, on average). You can keep your health insurance while on leave. If you contribute to the cost of your health insurance, you must continue to pay your portion of the premium cost

while on leave. Your employer is prohibited from discriminating or retaliating against you for requesting or taking paid leave.

Accrual of Employment Benefits During Leave

During the leave, if an employee substitutes paid leave time for unpaid time, the employee shall accrue employment benefits such as PTO on the same basis as other employees on paid leave. Otherwise, employment benefits shall not accrue. Employment benefits accrued by the employee up to the day on which the FMLA leave of absence begins will not be lost.

Employee Reporting Requirements

Bellwether may require an employee on FMLA leave to report periodically on their status and the intention of the employee to return to work and may require periodic recertification of the medical condition. Bellwether will notify the employee in writing of its initial requirement for medical certification. Bellwether will advise the employee of its need for additional medical certification in writing. If Bellwether receives a complete medical certification, it will limit its inquiries to the health care provider for clarification and authenticity. If the employee is covered by workers' compensation, Bellwether will follow workers' compensation procedures.

An employee taking leave due to the employee's serious health condition is required to obtain certification that the employee can resume work prior to the return from FMLA leave. Such certification must assess the employee's ability to return to work and perform the essential functions of the job as identified in writing by Bellwether.

Restoration of Employees Returning from FMLA Leave

Employees who return to work from FMLA leave of absence within or on the business day following the expiration of the approved FMLA leave are entitled to return to their job or an equivalent position without loss of benefits or pay in accordance with the FMLA.

FMLA Leave Procedure

Applications for FMLA leave of absence must be submitted in writing and signed by the employee's immediate People Leader. Applications should be submitted at least 30 days before the leave is to commence, or as soon as possible if 30 days' notice is not possible. Appropriate forms should be submitted to Human Resources to initiate a FMLA leave and to return the employee to active status. The application form is available from the Human Resources department.

Each employee taking leave that meets the requirements for FMLA leave will be provided with a Notice of Eligibility and Rights and Responsibilities that will inform the employee of the specific expectation and obligations of the employee. This notice will typically be provided to the employee within five business days of the start of the leave.

All medical documents, including the medical certificates, shall be maintained in the employee's confidential medical file. Bellwether will keep a record of all FMLA leave on its payroll records designated FMLA for every hour taken.

FMLA leave will run concurrently with all FMLA qualifying leaves including, but not limited to, workers' compensation.

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

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

Jury/Witness Duty

When employees are required to serve on jury duty, or are subpoenaed for witness duty, Bellwether allows the employee time off with pay to fulfill this obligation. Paid leave for all employees is limited to a maximum of 10 workdays per year, equal to the number of hours of the employee's regularly scheduled workday. If an employee's schedule is variable, then the day before and the day after the jury duty will be considered. Any jury/witness duty requiring over 10 days leave must be taken as PTO time.

Washington Family Care Act

The Washington State Family Care Act allow employees with available Paid Time Off leave to care for sick family members. In most cases, these rules coincide with the federal Family Medical Leave Act and are applied concurrently with FMLA. However, this is not always the case. Please contact Human Resources if you have questions pertaining to your specific situation.

Eligibility

All employees who have paid leave benefits in Washington State are covered by these rules, regardless of the size of the employer. The leave must be "available." "Available" means any leave that is earned and available for an employee's use at the time that it is taken. At Bellwether, "available" is the same as unused but accrued leave.

Reasons for Family Care Leave

- Under these rules, employees in Washington State are entitled to use their choice of sick leave or other paid time off, such as vacation or personal days, to care for a:
- Child with a health condition that requires treatment or supervision, to include the following:
 - Medical condition requiring treatment or medication that the child cannot self-administer.
 - Medical or mental health condition which would endanger the child's safety or recovery without the presence of a parent or guardian; or
 - Condition warranting treatment or preventive health care such as physical, dental, optical or immunization services, when a parent must be present to authorize the treatment.
- Spouse*, parent, parent-in-law, or grandparent who has a serious health condition or an emergency health condition:
 - Requiring an overnight stay in a hospital or other medical care facility.
 - Resulting in a period of incapacity, or treatment or recovery following inpatient care.
 - Continuing treatment under the care of a health care services provider that includes any period of incapacity to work or attend to regular daily activities; or
 - Demanding immediate action.
- Children 18 years or older that are "incapable of self-care because of a mental or physical disability that limits one or more activities of daily living."
- *Bellwether will extend this policy to allow eligible employees to care for the serious or emergency health condition of a qualified domestic partner.
- Please note the Family Care legislation does not include grandparents-in-law, grandchildren, or siblings.

Requesting Leave

Employees should complete a Leave Request Form as they would for any leave. However, nothing in these regulations preclude Bellwether from requesting documentation from the employee establishing the necessity for Family Care leave.

Concurrent Use of FMLA

Any leave taken under the Family Care rules that also qualifies for leave under the federal Family Medical Leave Act (FMLA) will be counted simultaneously as FMLA leave.

Military Leave

Regular employees will be granted military leaves of absence and reinstatement in accordance with applicable federal and state laws. If an employee is called to active military duty or to Reserve or National Guard training, or if the employee volunteers for the same, their People Leader should be notified, and copies of military orders submitted as soon as is practicable. For such duty up to a maximum of 10 working days per year and upon the employee's return to work, Bellwether will pay the difference between the military pay and the employee's regular pay rate for the days away from work. To receive this reimbursement, an employee should submit proof of military pay to Human Resources.

Washington Family Military Leave

Under Washington's Family Military Leave law, an employee whose spouse is called into active duty for the armed forces or who is, or will be, deployed during a period of conflict is entitled to up to 15 days of unpaid leave from work. The leave may be taken before deployment, or when the military spouse is on a leave from the deployment. For each new deployment, the employee may take another family military leave of up to 15 days.

An employee must provide Bellwether with notice of their intent to take family military leave within five business days of receiving official notice of the call to active duty or deployment, or within five business days of official notice of your military spouse's upcoming leave from deployment.

To be eligible, an employee must work an average of at least 20 hours per week. The leave is available only during a time of war, meaning the President or Congress has declared war, or military reserves have been called to active duty.

Unpaid Leave for Personal Reasons / Leave Without Pay

Employees may request unpaid leave for personal reasons up to a maximum of three weeks in a 12-month period subject to workload needs in their department as determined and approved by the department Director. Any unpaid leave must be requested in writing and approved in advance of the leave. Generally, such leave will only be approved in serious circumstances. Unpaid leave requests exceeding three weeks in a 12-month period require written approval by the Director of People & Culture.

For calculation purposes, the three weeks, if approved, will be proportionate to the employee's typical and customary work schedule. Employees are required to use all their available PTO leave prior to taking leave without pay. Employees are not paid for holidays which occur during unpaid leave. PTO leave does not accumulate during the period of unpaid leave.

Except for persons covered under the Family and Medical Leave Act, employee benefits will not of be paid by Bellwether for any leave without pay beyond two weeks.

Out of Office Communication When on Leave

E-mail

Employees should activate the Outlook Automatic Reply to notify of their absence. This communication should also include the timeframe of the absence, alternate contacts, and delegation authority. If appropriate to the absence. They should also update their Outlook calendar to reflect their absence.

Alternative Work Schedules

Employees participating in alternate work arrangements must post a copy of weekly office hours and locations in a visible location in their office/workstation as a courtesy to other Bellwether employees. Internal email communications pertaining to work schedule changes are also

encouraged. They should also update their Outlook calendar to reflect their alternative work schedule.

Section 6: Compensation and Payroll Policies

In 2019 and 2020 we took significant steps to ensure Bellwether's compensation philosophy was fair and transparent. Below are the principles upon which our revised salary structure has been based.

- Pay for performance, not tenure (length of time in your job)
- Analyze compensation for racial, gender and other implicit biases, and adjust compensation where potential bias is identified
- We increase salary transparency and shared all salary grades and ranges since early 2020
- Post open jobs from the 25% to the 50% of the salary grade, with some flexibility to pay above the 50% for highly experienced candidates
- Hire employees at no less than the 25% of their position's salary range, with some exceptions based on relevant circumstances
- Bring existing employees who are meeting expectations to the 25%

Compensation Reviews

Annual employee compensation review decisions are made each December for a January effective date.

Work Week

For payroll purposes, the Bellwether work week begins at 12:00 a.m. on Saturday morning and ends at 11:59 p.m. the following Friday evening. Two work weeks equal one "pay period."

Overtime Pay and Compensatory Time For Non-exempt (Hourly) Employees

The regular work week is 40 hours for full-time, non-exempt employees, but occasionally some overtime may be necessary and required as part of an employee's job responsibility. Non-exempt employees will be paid at one and a half times their regular rate of pay for all hours worked in excess of 40 hours within a work week. Except for emergencies, employees must receive permission from their People Leader prior to working overtime.

Working before the start of a normal workday, working through lunch, taking work home at night, or answering emails and/or telephone calls may cause an employee to incur overtime. Employees need approval from their People Leader prior to working overtime.

Compensatory Time

Compensatory time off may be given within a two week pay period. If an employee works two extra hours in the first week of the pay period, the employee may take three hours off (time and a half) in the second week of the pay period and incur no overtime. Employees need approval from their People Leaders to take compensatory time off.

Holiday Hours

PTO leave and other times not actually worked, even if paid, are not required to be counted toward overtime per federal wage and hour law. However, the law allows a company to include these hours if it so chooses. It is Bellwether's policy to include holiday hours in calculating overtime pay, but not to include other paid time off. Bellwether reserves the right to change this policy at any time.

Pay Period, Timesheets, and Payday

Paydays are the Friday after the end of a pay period (every other week), unless that Friday is a federal banking holiday.

If a payday falls on a federal banking holiday, employees will be paid on the last working day prior to that holiday. For example, when Veterans Day falls on a Friday, a banking holiday, payday will be on Thursday of that week.

If the payday is a Bellwether holiday, but not a banking holiday, i.e., Native American Heritage Day aka the Friday after Thanksgiving, employees will be paid on Friday.

All non-exempt (hourly) employees must keep a timesheet. Timesheets can be accessed in the Paylocity Self-Service Portal. Timesheets should be filled out daily. People Leaders will approve timesheets at the end of the pay period. Each employee is responsible for filling in their timesheet completely and accurately, and by the last day of the pay period. If an employee has a pre-planned absence that falls at the end of a pay period, they should fill out their timesheet for that pay period in advance of taking the leave.

Payday Advances

Bellwether does not give payday advances.

Direct Deposit

All employees are required to use direct deposit into a bank account for the purpose of receiving wages from Bellwether. Changes can be made by the employee within Paylocity via the Self-Service Portal. On the rare occasion that a paper check may be needed, transition between banking institutions etc., and employee can make the request of Payroll. Please note this would be an exception.

Pay Stubs

The information that is provided on a pay stub is intended to keep employees fully informed of their compensation, payroll-related benefits, and deductions. All pay stubs after November 2018 are within Paylocity. For historic pay stubs, please contact the Assistant Controller.

Payroll Deductions

Federal Withholdings

Bellwether is required by law to make payroll deductions for Income, Social Security and Medicare taxes. These amounts are subtracted from gross pay and the exact amount to be deducted depends, in part, upon the information provided by the employee on their W-4 tax form. Employees can change their withholding status at any time by submitting an updated W-4 tax forms to the Payroll Specialist. W-4 forms are available on Paylocity, IRS.GOV or from the Payroll Specialist.

Labor and Industries

Washington State's Labor Insurance is commonly referred to as L&I or Workers' Compensation. A portion of the premium, which is based on the number of actual hours worked in a pay period, is paid by Bellwether. The rate is determined by the State of Washington and is adjusted according to Labor and Industries claims attributed to an employer.

Garnishments, Attachments, and Judgments

Bellwether may be required by law to withhold a specific amount of earnings from an employee's paycheck. Upon notification of a garnishment, attachment, or judgment requiring such a withholding, Bellwether will promptly notify the employee. If the individual or entity that initiated the withholding meets specific legal requirements, the withheld compensation is generally

transmitted to the court, the employee's creditor, or to the proper government agency. These matters will be handled in confidence by HR and payroll.

Voluntary Employee Deductions

Bellwether may also take the following deductions based on employee enrollment agreements:

- **Flex Plan/Section 125** – Pre-tax salary reduction for healthcare and/or dependent care savings.
- **Retirement Savings Plan** – Pre-tax salary reduction for an employee's own contributions.
- **Health Care Premiums** – Pre-tax salary reduction for an employee's portion of healthcare costs, or for eligible dependent premiums not paid by Bellwether.

Employee Donations to Bellwether Housing

Employees have the option to donate to Bellwether through payroll deduction. This is an individual choice and entirely voluntary.

Payroll donations will be taken from each paycheck in the amount designated by the employee. Donations by payroll deduction remain in effect for one calendar year and must be renewed each year. Employees may stop their deductions at any time for any reason by notifying Human Resources.

To start donating by payroll deduction, please complete the Donate by Payroll Deduction Form and submit it to Human Resources or Payroll. The document is available in Paylocity.

Donate by Check or Money Order

One-time contributions should be made by check, money order or online via bank or credit card and not by payroll deduction. Checks or money orders should be given to the Controller.

Acknowledgement of Donations

Donations to Bellwether are tax deductible. All employees who donate money to Bellwether will receive a thank you letter acknowledging the amount donated. Employees who donate one time only will receive their letter immediately. Employees donating through payroll deduction will receive their letter at year-end, or whenever they end their deductions. Information about individual donations will be kept confidential.

Expense Reimbursement

Whenever possible, Bellwether should be billed directly for purchases in connection with Bellwether activities, events and expenditures for work-related materials. In some cases, or petty cash funds may be used. Use of personal funds for Bellwether purchases must have prior written approval and should be avoided whenever possible. Bellwether follows the [GSA per diem rates](#) and the [IRS mileage](#) reimbursement standards,

Reimbursement requests of \$25 or more must be accompanied by the original vendor receipt for a purchase made.

Travel and Entertainment Expenses

In the case of overnight business travel, including but not limited to conferences and industry events, an employee will be given a \$75 per diem to be used as they see fit for meals and snacks. If you are issued a Bellwether credit card, you must use the company credit card and not a personal credit card.

When possible, airfare, lodging and car rental must be booked at least 2-weeks in advance using a Bellwether credit card to take advantage of potential savings. You must keep the receipts for all business-related expenses or purchases over \$25. You will need the receipts to be

reimbursed for expenses paid by cash or a personal credit card and or for reconciliation of your corporate credit card statement the following month.

For approved entertainment related expenses, such as a dinner, receipts should include the names and business affiliations of those attending. In the case of an event or dinner where two or more employees are in attendance, the senior most employee should use their Bellwether issued credit card and handle the reconciliation the following month.

Company Credit Cards

Employees may be issued Bellwether credit cards for company expenditures. This card is only to be used by the employee whose name it was issued under, and shall not be shared with any other employees for their use. Authorized card holders must use their card within their card's approved credit limit and annual budgets. A request can be made of the Finance team for a temporary increase in the credit limit, when appropriate. Employees must provide a receipt for all charges over \$25. Personal use of a company credit card is prohibited and may result in disciplinary action up to and including termination of employment. Each employee issued a company credit card will need to sign the Credit Card Holder User Agreement form issued by the Controller. Bellwether cardholders will need to reconcile their receipts and purchases each month in Yardi Voyager.

Mission Advancement Bonus Policy

The goal of the Mission Advancement Bonus Program is to provide special recognition to Bellwether employees who have accomplished an extraordinary achievement within our organization. Mission Advancement Bonus recipient's contributions may be tied to the goals from Bellwether Housing Strategic Plan.

Such achievements may include:

- Demonstrated extraordinary performance substantially beyond expectation on a specific assignment, project, or goal.
- Contributions that have a significant impact on department or company objectives.
- Extraordinary efforts above and beyond the normal duties and expected workflows of the position.
- Successful completion of a special project of significant importance to warrant special recognition.
- Organizing/implementing an innovation that improves efficiency, reduces costs or increases or revenue, or
- Assumed and successfully performed an additional workload for an extended period.

Accomplishments should be measurable. The bonus will be paid as one-time cash payment. A Mission Advancement Bonus may be made any time during the year. An employee who has taken on significant new and on-going responsibility may be a better candidate for a salary increase than a Mission Advancement Bonus.

Eligibility and Process

All Bellwether employees are eligible. A Mission Advancement Bonus can be given on an individual or team basis. The department of the employee or team receiving the Bonus will be charged with the expense of the Mission Advancement Bonus.

- **Responsible Party – Employee's People Leader** - Nominations are made by an employee's People Leader and are approved by the department Director.
- **Consulted Party – Leadership Team** - The Leadership Team will be informed of the nomination prior to finalization of the Bonus and will have an opportunity to comment on the nomination.

- **Accountable Party – CEO** - After receiving comments from the Leadership Team, the CEO will either approve, modify or disapprove the Mission Advancement Bonus.
- **Informed Parties – Recipient(s), Recipient’s People Leader, and Department Director** – The CEO will notify the nominating People Leader and the Leadership Team of its final decision. The nominating People Leader will inform the recipient(s) of the Mission Advancement Bonus.

Section 7: Bellwether Benefits

Bellwether offers a competitive and generous employee benefits. Benefits are reviewed in detail during the benefits orientation within 30 days of hire.

Benefits can be reviewed at any time at www.mybellwetherhousing.com

The Employee Handbook offers only an overview of current Bellwether benefits. For more full details, please see the Summary Plan Descriptions and plan contracts, which are available in Paylocity and at www.mybellwetherhousing.com.

Benefit plans are updated annually. Bellwether reserves the right to change or terminate any of its’ benefits at any time.

Eligibility

Eligibility for benefits varies depending on a regular employee’s classification. All employee classifications are subject to a 30-day minimum waiting period before becoming eligible to participate in Bellwether benefits. The following benefits are available to eligible employees based on employee classification:

Summary of Eligibility for Company Benefits

Benefits	Full-time (≥ 30 hrs/wk)	Part-time (20-29 hrs/wk)	Temporary Workers
Health, Dental, Vision	✓	✓	After 90 days
Life Insurance	✓		After 90 days
Disability Insurance	✓		After 90 days
403(b) Contribution	✓	✓	After 1000 hours worked
Flexible Spending	✓	✓	After 90 days
Health Reimbursement	✓	✓	After 90 days
EAP Plan	✓	✓	After 90 days
Paid Time Off	✓	✓	After 90 days
Paid Holidays	✓	✓	After 90 days
Transportation Benefit	✓	✓	After 90 days

Regular, part-time employees who are consistently scheduled to work less than 20 hours per week are not eligible for Bellwether benefits.

Temporary employees of Bellwether do not become eligible for benefits, except for any leave benefits required by law, until they have been with the organization for 90 days.

When an employee's regular work schedule is reduced below the stated required hours for various benefits, those benefits terminate at the end of the month during which the schedule change is implemented.

If an employee's regular hours are increased to a new level of eligibility, those benefits will begin on the first day of the month following one full month of employment as an eligible employee. The original hire date will not determine when various benefits begin in this case.

Insurance

The following group insurance plans are available for eligible Bellwether employees and their dependents. For a complete explanation of coverage, please review the insurance summary plan documents on Paylocity or www.mybellwetherhousing.org or contact Human Resources.

Health Insurance (Medical, Dental, and Vision)

Regular employees working 20 hours per week or more are eligible for group healthcare coverage through Bellwether, including medical, dental, and vision benefits. Bellwether pays 90% of the monthly premium for any regular employee working 20 or more hours per week on the HMO and PPO plans or 100% of employees on High Deductible Health Plan (HDHP). The HDHP plan is the only plan that is HSA eligible.

Bellwether subsidizes a portion of the premiums for eligible dependents. The employee portion of the premium is paid through payroll deduction. Healthcare coverage will commence on the first day of the month following one full month of employment.

Eligible employees may choose not to receive group healthcare benefits through Bellwether if they have coverage elsewhere. However, there will be no additional compensation as a result of the decision to decline Bellwether healthcare benefits.

Eligible Bellwether employees and their dependents can continue healthcare coverage at their own expense if they lose entitlement to group health plan coverage due to the loss of employment, reduction of hours, or other qualified reasons covered under the Consolidated Omnibus Budget Reconciliation Act (COBRA). In the case of lost coverage, a detailed description of COBRA will be provided to eligible persons.

Life Insurance

Regular employees working 20 to 40 hours per week are eligible for Bellwether-paid life insurance coverage, and for dependent life insurance for their immediate family members. Please refer to the My Benefits in Paylocity for further details. Voluntary life insurance is also offered in increments of \$10,000 with premiums paid by the employee.

Long-Term Disability

Bellwether offers long-term disability plans for regular, full-time employees who are regularly scheduled to work 30 or more hours per week. In the case of a disability that prevents an employee from working, the employee will receive a percentage of their salary following a period of time after the onset of the disability. Please refer to My Benefits in Paylocity for further details.

Flexible Spending Accounts (Section 125)

The Flexible Benefits program is a voluntary plan designed to reduce an employee's taxable income. Eligible employees can direct a portion of pre-tax income into a Flexible Spending Account. They can use the FSA account for qualified health or dependent care expenses incurred during the plan year. FSA funds generally must be used within the calendar year ("use it or lose it").

A complete description of the plan is available in Paylocity under My Benefits.

Employees should evaluate if participating in the FSA program is right for their personal circumstances. Employees are encouraged to consult with a tax advisor to evaluate the effect of this plan on personal tax liability. The Employee Assistance Program can help employees find tax advice.

Employee Assistance Plan (EAP)

We offer you and your eligible family members an Employee Assistance Program (EAP) through Wellspring Family Services. The EAP provides confidential, immediate, professional assistance with any issues that create stress or anxiety in your life. Counselors are available by phone 24 hours a day, 7 days a week. In addition, the EAP provides up to 3 face-to-face counseling sessions per concern. There is no cost to you for this benefit. If more sessions are needed, the EAP professionals can work with Cigna to determine further coverage. Visit www.wellspringeap.org, username: Bellwether or call 800-553-7798.

403(b) Retirement Savings Plan

Bellwether has established a 403(b)-retirement savings plan for regular employees working 20 or more hours per week. The purpose of a retirement plan is for the employee to have a source of income at retirement to supplement Social Security and personal savings.

Bellwether contributions to the employee's account are paid on a quarterly basis at the end of each calendar quarter. Employer contributions being at the end of the first full calendar quarter worked after an employee has reached their one-year employment anniversary. Employees must be employed on the last day of a quarter to qualify for that quarter's contribution. An example follows:

- Employee was hired on February 14, 2014.
- The employee's one-year anniversary would be February 14, 2015.
- The first full calendar quarter after that date would be the second quarter of 2015 (April, May, June of 2015).
- Bellwether would contribute to the employee's 403(b) account at the end of June 2015, and for each full calendar quarter worked by the employee thereafter.

Employees may immediately contribute to their accounts on a pre-tax and after-tax basis through regular payroll deductions. All employee salary reductions and employer contributions are 100% vested at the time of contribution.

Paid Time Off (PTO)

Bellwether recognizes that employees have diverse lives outside of work and need time off from work. Our PTO plan offers a flexible approach to time off.

PTO leave can be use used to cover time away from work for vacations, illness, or other personal reasons. It can also be used for medical, dental or other personal appointments for yourself or your family members. Employees should request leave in advance via Paylocity for anticipated time off.

Employees are responsible for managing their own PTO hours. We strongly encourage employees to maintain 40 hours of PTO through at least the end of November to cover time away for illness, injuries, and emergencies.

Partial day absences may be covered by working additional hours during the pay period in which the absence occurs, providing there is work to be done and with approval from your People Leader. Otherwise, employees should request PTO leave to cover partial day absences.

Leave cannot be deducted from PTO for less than one full hour for non-exempt (hourly) employees. If the absence is for at least one full hour, then it may be taken in additional increments of less than one hour thereafter. After the first hour of leave, partial hours should be rounded down to the nearest quarter hour. For example, if you will be away from work for 45 minutes, you do not need to request leave, but you do need to inform your People Leader. If you will be gone for one hour and 20 minutes, you would request 1.25 hours of leave (rounding the 20 minutes down to the nearest quarter hour).

For exempt (salaried) employees, PTO leave should not be taken for less than 4-hour increments.

Time away from work for company holidays, jury duty, or military leave is not covered under the PTO plan, and you should not request PTO leave for these events. Holidays, jury duty, and military leave are covered under separate policies.

PTO Eligibility

PTO is accrued upon hire, or when transferring into a benefits eligible position. Eligible employees must be scheduled to work at least 20 hours per week on a regular basis. Employees working less than 20 hours per week on a regular basis and on-call and temporary employees are not eligible to accrue PTO.

Availability

Accrued PTO is available for employee use after a 30-day waiting period from the original date of hire, or the date of eligibility (see Benefits Eligibility section) and needs approval from an employee's People Leader.

Leave Requests

All PTO requires People Leader approval and should be scheduled and approved at least 5 days in advance, except in the event of unanticipated illness or an emergency. This advance notice assists with departmental scheduling and coverage. Leave requests will be considered and approved on a first-come, first-scheduled basis. People Leaders may request that leave be scheduled further in advance to accommodate longer-term planning. Employees submit PTO requests through Paylocity.

People Leaders will make every effort to approve employee leave requests while taking into account departmental and company workload and staffing needs. People Leaders have discretion to approve or deny PTO requests based on required minimum staffing levels for the department. Department Directors are encouraged to communicate the minimum staffing requirements to employees in the department. People Leaders can cancel previously approved PTO absences if an employee has decided to terminate their employment with Bellwether.

Employee PTO Responsibility

Keep your People Leader informed of your PTO plans, and, when possible, please plan your PTO as far in advance as possible for planning purposes. Prior to a planned PTO greater than 3-days, employees should partner with their People Leader on a backup plan.

Accrual of PTO

Regular full-time and part-time employees working 20 or more hours per work week will accrue PTO proportionally based on the established standard weekly work hours for their job, excluding overtime. For example, an employee working 30 hours per week is working 75% of a full-time schedule and would receive 75% of the full-time accrual rate. In this case, 75% of 7.38 hours would be 5.54 hours of accrual per pay period in the first year of employment, equating to 144 hours annually.

The length of service determines the rate at which employees accrue PTO. Employees become eligible for a new higher accrual rate each year, which becomes effective the first payroll in which

the employee's anniversary date falls. A detailed PTO Accrual Schedule for full-time employees is as follows:

PTO ACCRUAL SCHEDULE			
Year of employment	Hours accrued per pay period	Hours earned by year end	Days earned by year end
1	7.38	192	24
2	7.69	200	25
3	8.00	208	26
4	8.31	216	27
5	8.62	224	28
6	8.92	232	29
7	9.23	240	30
8	9.54	248	31
9	9.85	256	32
10	10.15	264	33
11	10.46	272	34
12+	10.77	280	35

COVID-19 PTO Provisions

Through December 2021, employees may be allowed to carry a negative balance of up to 40 hours in their PTO accounts. Should the Covid-19 pandemic continue past December 31, 2021 – Bellwether will revisit this guideline.

PTO Carryover

Full time employees may carryover a maximum of 160 hours of PTO from calendar year to the next. We encourage all employees to use their PTO.

The maximum carry-over hours for other eligible employees will be prorated based on the employee's standard work week. For example, an employee who works 30 hours per week is working 75% of a full-time week; 75% of 160 hours is 80 hours, and 90 hours is the maximum carry-over.

Any unused PTO more than the allowable PTO carry-over will be transferred to the employee's Extended Illness Bank (E-bank), not to exceed the E-bank maximum accrual.

Holidays

Bellwether observes the following holidays for which regular and temporary, full-time, and part-time employees working more than 20 hours per week or more will receive their regular rate of pay.

In recognition of the diversity of our staff, residents, and the communities that we serve, we also see holidays as another way to advance and align with our equity, inclusion, and anti-racism work. Inclusive holiday recognition is an opportunity to increase staff, resident, and community awareness and multicultural knowledge.

As of 2020, All employees can self-select their holidays each year as their holiday days off. This is accomplished during the benefits open enrollment period via Paylocity in December of each year.

Bellwether Holidays (effective January 2022)

This list below represents our standard paid holidays:

- **New Year's Day** (January 1)
- **Martin Luther King Jr. Day** (Third Monday in January) – U.S. federal holiday commemorating the birthday of Martin Luther King Jr. who was born on January 15, 1929. Dr. King was the chief spokesperson for [nonviolent](#) activism in the [Civil Rights Movement](#), which protested racial discrimination in federal and state law.
- **International Women's Day** (March 8) – Global celebration honoring women's economic, political, and social achievements.
- **Memorial Day** (Last Monday in May) – Commemorates those who died while serving in the military.
- **Juneteenth** (June 19) – Also known as Freedom Day, Jubilee Day, Liberation Day, and Emancipation Day, Juneteenth is the nationally celebrated commemoration of the ending of slavery in the United States, on June 19, 1865.
- **Pride Day** (Last Sunday in June-observed the Monday following Seattle Pride Day) – The promotion of self-affirmation, dignity, equality, and legal protections for LGBTQ+ people.
- **Labor Day** (First Monday in September) – Celebrates the Labor Movement in America.
- **Indigenous Peoples Day** (Second Monday in October) – Commemorates Native American peoples, their histories, and cultures.
- **½ of Election Day** (Tuesday following the first Monday in November) – 4 hours offered.
- **Veteran's Day** (November 11) – Honoring military veterans.
- **Native American Heritage Day** (Fourth Friday in November) – Celebrating and acknowledging Native Americans as the first peoples of this land, acknowledging their cultural heritage and importance to our past, present, and future and recognizing their resiliency and survival of colonialization, that colonists committed genocide and laid claim to their land.

Weekend Holidays

When a holiday falls on a Saturday or Sunday, the time off will be scheduled before or after the weekend. A calendar showing holiday time off for the year is available in Paylocity.

Holiday Pay

Holiday pay is provided in 8-hour increments for all full-time employees. Employees working on an alternate work plan may be required to supplement holiday pay with accrued leave. Employees who are regularly scheduled to work less than 40 hours per work week will receive holiday pay based on the following schedule:

Regular full-time and part-time employees working 21-40 hours per week: Holiday pay is given for same number of hours as a regularly scheduled day (i.e., a person working five 6-hour days will receive 6 hours of holiday pay). If the employee's schedule varies from day to day, the number of hours worked on average, per workday that week will be considered.

Regular half-time employees working 20 hours per week: These employees are eligible for holiday pay on a 50% pro rata basis (i.e., a half-time Site Manager would receive four hours of holiday time off for a holiday).

Regular employees working less than 20 hours per week and temporary employees: These employees are generally not eligible for holiday pay (see Benefit Eligibility section.) Time off taken will be considered leave without pay. However, with approval from the People Leader, the employee's schedule may be flexed within the same work week to make up the lost hours.

When the holiday falls on an eligible employee's scheduled day off, then the holiday will be granted for a different day within the calendar year at the same number of hours regularly worked in a day, not to exceed 8 hours.

Holiday Eligibility

An employee will not be paid for a holiday if the employee is not in "pay status" either the day before or the day after the holiday (including unpaid FMLA leave). Examples would be if the employee were on leave without pay, or if the day adjacent to the holiday was the beginning or end of employment at Bellwether.

Working a Holiday

People Leaders should plan for upcoming holidays. If it is necessary for the employee to work on one of the above-mentioned holidays, the employee may take off a different day within the calendar year. An equal number of hours should be taken off as the number of hours worked on the holiday.

Learning & Development Policy

Bellwether Housing encourages employees' learning and development, and supports training, programs, and continuing education that enables employees to acquire skills and knowledge to perform their jobs more effectively, grow into new positions within Bellwether, and advance their careers. With approval from People Leaders, Bellwether Housing will contribute to the cost of training, professional development activities, and continuing education as outlined below.

Training & Professional Development

Training is job-oriented, focused, and finite. The purpose of training is to obtain specific skills required to do a job. Professional development is career-oriented, conceptual, and continuous. The purpose of professional development is to learn competencies to elevate performance, advance career goals, and prepare for future roles and responsibilities.

During the budget and performance review processes, People Leaders assess the training and professional development needs of the organization, departments, and employees. People Leaders are responsible for making time each year in employees' work schedules to accommodate training and professional development. This includes but is not limited to attendance at webinars, seminars, conferences, and other events held throughout the year that support career success and growth.

- Bellwether budgets a flat amount per year for each employee to pursue training and professional development opportunities (e.g., conferences, seminars).
- Departments may budget for specific training or professional development activities that support a group or the entire department business needs (e.g., project management, conflict resolution, communication styles).
- The organization often budgets for voluntary training and professional development activities for all or a subset of employees (e.g., equity and anti-racism training, supervisor training).

Department Directors are responsible for identification of required and other planned training and professional development activities for positions within their departments, and for ensuring that the appropriate costs are included in the annual operating budget. Department Directors are also responsible for the approval process, which may include delegating authority to other leaders within their team. Department Director approval is required for out-of-town travel, and this approval may not be delegated. Upon approval, Bellwether will pay for travel, accommodations, and meal expenses related to out-of-town training and development.

Continuing Education Assistance

Continuing education is career-oriented, conceptual, and finite. The purpose of continuing education is to increase understanding, elevate performance, advance career goals, and prepare for future roles and responsibilities. Continuing education is considered any certificate or degree program (e.g., high school equivalency diploma, undergraduate courses, graduate courses, professional certification programs). The Human Resources department budgets for continuing education annually, subject to budgetary constraints.

Individual employees may request Bellwether's support for a portion of the cost of continuing education that is not a requirement of the employee's current job and would provide a direct benefit to Bellwether and the employee by:

- Preparing the employee for increases responsibilities or a new assignment, **or**
- Preparing the employee for a different position within Bellwether.

If the continuing education is applicable to the employee's current position, Bellwether will pay 75% up to \$2,500 of the cost per year, subject to budgetary constraints.

If the continuing education is applicable to a future position at Bellwether at to which an employee aspires, Bellwether will pay 50% up to \$2,500 of the cost per year, subject to budgetary constraints.

Eligibility

To be eligible for continuing education assistance, an employee must meet all the following criteria:

- Be a regular full-time employee working thirty (30) or more hours per week.
- Have completed one (1) year of continuous employment.
- Be in good standing with no outstanding performance improvement plans.
- Receive credit for satisfactorily completing the course or program, or if no credit is offered, other evidence of satisfactory completion.

Repayment of Bellwether Costs upon Termination

An employee who received continuing education assistance must reimburse Bellwether for any costs paid by Bellwether if either of the conditions below apply:

- The employee's employment is terminated, voluntarily or involuntarily, within one full year following the last day of the course or program and the cost was \$1,000 or more.
 - In this case, Bellwether will collect the amount owed from the employee's final paycheck. If there is a remaining balance thereafter, the employee must make other arrangements with Human Resources to reimburse Bellwether.
- The employee does not satisfactorily complete the course or program.
 - In this case, the employee can pay Bellwether the balance via a one-time or recurring payroll deduction; repayment may not exceed one year.

Application Process

To request continuing education assistance, an employee must complete a Continuing Education Assistance Application form, available on Paylocity and include a written description of the course or program and related fees sufficient to assist in the evaluation of the quality of the program and the relevance to the employee's position. Once complete, the application should be forwarded to the employee's People Leader.

People Leaders shall evaluate the substance, quality, and relevance of the continuing education proposed and should only approve of programs that meet the guidelines outlined in this policy and are of excellent quality. People Leaders should also review the dates and times of the course

or program to check for overlap with work hours that would require a change to the employee's work schedule. Once the People Leader has approved the application, it should be forwarded to the department Director for approval who will then submit it to the Director of Human Resources for final budgetary approval.

Required Position-Specific Training

Some Bellwether positions have specific required training, certification, or licensure of which Bellwether will pay 100% of the cost. This includes but is not limited to technical training, industry-specific training, and continuing education required to maintain certifications or licenses. If required, the training, certification, or licensure will be noted in the job description. There may be instances where both Bellwether and the employee benefit from membership in professional associations. The employee and People Leader will discuss these situations and determine the appropriate cost reimbursement.

Thank you for taking the time to read Bellwether's Employee Handbook.

Starting a new job is a big milestone. You are no doubt feeling both excited and a little nervous. After all, a new job comes with a lot of change - from a new routine, to a new commute, to a new environment. If there is anything we can do to support you as you settle into your new role, please let us know.

We look forward to seeing you flourish and grow in your career.