



Hebrew Charter School Center

EMPLOYEE HANDBOOK

THE HEBREW CHARTER SCHOOL CENTER EMPLOYEE HANDBOOK

The provisions of the Handbook have been developed at the discretion of management and, except for its policy of employment-at-will, may be amended or cancelled at any time at HCSC's sole discretion. The policies of this Handbook apply to all employees; by working at HCSC, an employee agrees to adhere to these policies.

These provisions supersede all existing policies and practices.

WELCOME and OVERVIEW

Welcome to the Hebrew Charter School Center (“HCSC” or the “Company”)! We are excited to have you as a part of the team. The information contained in this document is intended to guide and assist you as you help HCSC pursue its mission.

HCSC is a nonprofit organization created by the Areivim Philanthropic Group in 2009 to help advance the Hebrew language charter school movement. HCSC works with planning teams and existing charter schools across the country to:

- ♦ Build and increase the capacity for designing new, high quality Hebrew language charter schools;
- ♦ Provide resources for established schools;
- ♦ Grow a field of educators prepared to lead Hebrew language charter schools and the movement;
- ♦ Promote and support a network of high quality Hebrew language charter schools;
- ♦ Support local communities to develop Hebrew language charter schools and to maximally benefit from their impact on children and families.

HCSC is pleased to provide you with an Employee Handbook which describes HCSC’s policies and procedures applicable to its employees. It has been prepared to assist you to better understand your duties and responsibilities as an employee of HCSC. You are responsible for reading and understanding this Employee Handbook. In addition to clarifying our policies and procedures, this Handbook describes the benefits available to our employees. If you have any questions about the matters referenced in this Handbook, please discuss them with the CEO.

Occasionally, it may become necessary to modify, update, replace or even terminate the policies outlined in this Handbook, and HCSC reserves the right to make changes at any time at its discretion. Generally, you will be informed about any changes, but changes can also be made without notice. The language contained in this manual does not and is not intended to create any contractual rights or obligations – it is not a contractual agreement – and is provided for informational purposes only. Although we hope that your employment here will be mutually rewarding, both you and the Company retain the right to end the employment relationship at any time with or without cause or notice. Please understand that any agreement with you for employment for any specified period, or any promises or commitments contrary to the foregoing, must be in a writing signed by a duly-authorized Company officer.

This manual applies to all employees of the Company, unless otherwise stated. At all times, HCSC remains solely responsible for the interpretation of the provisions in this manual and their applications. If you have any questions, please do not hesitate to contact your supervisor.

This Employee Handbook summarizes some features of the current benefit plans offered. The terms, conditions and limitations of the official plan document will take precedence over the brief summaries found in this Handbook. Should questions arise regarding the interpretation of any benefit plan; the answers will be determined by the actual plan documents, which you may obtain from HCSC.

We wish you the best of luck and success in your position and hope that your employment relationship with HCSC will be a rewarding experience.

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SECTION I EMPLOYMENT POLICIES

I - Your Employment Relationship with HCSC and “At Will” Statement

Employment at HCSC is employment-at-will. This means that either HCSC or an employee may terminate the employment relationship at any time for any reason, with or without notice. Any change to these policies will be communicated in writing to employees.

Policies set forth in this Handbook are not intended to create a contract, nor are they to be construed to constitute contractual obligations of any kind or a contract of employment between HCSC and any of its employees.

2 - Equal Employment Opportunity

HCSC is an equal opportunity employer, providing equal employment and advancement opportunities to all individuals. Employment decisions at HCSC will be based on merit, qualifications, and abilities. HCSC does not discriminate in employment opportunities or practices on the basis of actual or perceived race, creed, color, religion, gender, ancestry, national origin, citizenship status, age, disability, handicap, veteran status, marital status, sexual orientation, genetic information, union membership or any other characteristic protected by law. This policy extends to all aspects of employment, including but not limited to, recruitment, selection, compensation, benefits, promotion, training, transfer and termination. HCSC will provide reasonable accommodations for the sincerely-held religious beliefs of employees, upon request, in accordance with applicable law and provided that the accommodation(s) do not cause an undue hardship on HCSC's business.

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or the CEO. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

3 - Disability Policy

As required by law, HCSC considers requests for reasonable accommodations on a case-by-case basis, with attention to the individual circumstances of the employee or applicant requesting the accommodation. In addition, pregnant employees in New York City are entitled to reasonable accommodations to allow them to perform the essential functions of their jobs. Should you have a disability and need an accommodation, you must make the request to the Director of Finance and Operations. Once HCSC has received your request, HCSC will evaluate it in consultation with you and others as needed to determine what (if any) accommodation will enable you to perform the essential functions of your job. No accommodation will be provided if it imposes an undue hardship on HCSC or poses a direct threat to the health or safety of HCSC's employees, community or

vendors. Employees requesting reasonable accommodations due to a disability may be required to provide documentation from a medical provider of the employee's workplace limitations.

Employees must also cooperate in good faith in HCSC's efforts to evaluate the accommodation. This may involve meetings or discussions with you, the Director of Finance and Operations and/or your supervisors or others to discuss the accommodation, or may involve gathering additional information from your health care provider or others regarding the accommodation.

If you have any questions about the proper procedure or require assistance, please contact the Director of Finance and Operations.

4 - Sexual and Other Unlawful Harassment or Discrimination

HCSC is committed to providing a work environment that is free from all forms of discrimination and conduct that can be considered harassing, coercive, or disruptive, including but not limited to sexual harassment. Actions, words, jokes, or comments based on an individual's sex, race, color, ancestry, national origin, age, religion, disability, handicap, medical condition, marital status, veteran status, sexual orientation, genetic information, or any other legally protected characteristic may also be unlawful and will not be tolerated. HCSC's anti-harassment and anti-discrimination policy applies to all persons involved in the operations of the HCSC, and prohibits, among other things, harassment or intimidation of any employee by another employee, supervisor, manager, vendor, consultant, or any colleague of the HCSC.

Complaint Process

If any of our employees believes that he or she has been subjected to sexual or other unlawful harassment, the employee should file a complaint with their supervisor or CEO or Director of Finance and Operations. This may be done in writing or orally. These people are also available to discuss any concerns you may have and to provide information to you about our policy on sexual harassment and our complaint process. Any supervisor or manager who becomes aware of possible sexual or other unlawful harassment must immediately advise the Director of Finance and Operations or any member of management so it can be investigated in a timely and appropriate manner. Any complaint against the CEO should be brought to the Secretary and Treasurer of the HCSC Board.

All allegations of sexual or other unlawful harassment will be taken seriously and promptly and thoroughly investigated. To the extent possible, the confidentiality of the complainant and that of any witnesses and the alleged harasser will be protected against unnecessary disclosure. Anyone determined to be engaging in conduct in violation of this policy will be subject to disciplinary action, up to and including termination of employment. HCSC will not retaliate against any employee who reports a "bona fide" report of harassment, discrimination or intimidation and will not permit or tolerate retaliation by management, employees, or co-workers. All employees should take special note that, as stated above, retaliating against an individual who has complained about sexual harassment, and retaliating against individuals for cooperating with an investigation

of a sexual harassment complaint is unlawful and will not be tolerated by HCSC. HCSC encourages all employees to report any incidents of harassment forbidden by this policy immediately, so that complaints can be quickly and fairly resolved.

Definition of Harassment

Sexual harassment is defined as sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- (a) submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or used as a basis for employment decisions such as favorable reviews, salary increases, promotions, increased benefits or continued employment regardless of whether the harasser actually carries through with the threats to alter the subordinate's terms or conditions of employment; or
- (b) such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment. This definition includes many forms of offensive behavior and includes gender-based harassment of a person of the same sex as the harasser.

While it is not possible to list all circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- ♦ Verbal conduct, including but not limited to making or using derogatory comments, epithets, slurs, or jokes.
- ♦ Requests for sexual favors or unwanted sexual advances.
- ♦ Offering employment benefits or conditioning any term or benefit of employment upon sexual favors.
- ♦ Making or threatening reprisals after a negative response to sexual advances.
- ♦ Visual conduct, including but not limited to leering, making sexual gestures, or displaying sexually suggestive objects or pictures, cartoons or posters.
- ♦ Verbal sexual advances or propositions.
- ♦ Verbal harassment, such as epithets, derogatory comments or slurs, verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, or suggestive or obscene letters, notes, or invitations.
- ♦ Physical conduct such as touching, assaulting, or impeding or blocking movements or any physical interference with normal work or movement when directed at an individual.

- ◆ Negative stereotyping.
- ◆ Visual forms of harassment, such as displaying derogatory posters, cartoons or drawings that are offensive, written or graphic material that denigrates or shows hostility or aversion toward an individual or group based upon a protected classification, and that is placed on walls, bulletin boards, desk or elsewhere on the employer's premises, or circulated in the workplace on paper or electronically.
- ◆ Any other conduct that unreasonably interferes with an employee's performance of his or her job or that creates an intimidating, hostile or offensive working environment.

HCSC strongly supports the rights of all its employees to work in an environment free from all forms of unlawful harassment, including harassment on the basis of race, color, religion, gender, sexual orientation, national origin, age, disability, genetic information or any other protected category.

Unlawful harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of a protected characteristic, and that:

- ◆ creates an intimidating, hostile or offensive working environment;
- ◆ unreasonably interferes with an individual's work performance; or
- ◆ otherwise adversely affects an individual's employment opportunities.

Unlawful harassing conduct includes, but is not limited to:

- ◆ epithets;
- ◆ slurs;
- ◆ negative stereotyping;
- ◆ threatening, intimidating or hostile acts that relate to a protected characteristic; and
- ◆ written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of a protected characteristic, and that is placed on walls, bulletin boards, or elsewhere on the employer's premises, or circulated in the workplace on paper or electronically.

If you experience or witness any form of unlawful harassment of any kind, please immediately tell the harasser that the behavior is unwelcome and inappropriate. The next step is to immediately report it to your supervisor. If the supervisor is unavailable or you believe it would be inappropriate to contact that person, you should immediately contact the CEO. You can raise concerns and make reports without fear of reprisal or retaliation.

5 - Open Door Policy

In order to foster an environment that encourages communication and feedback, HCSC has instituted an Open Door Policy.

It is the Company's philosophy that the problems and misunderstandings that may arise concerning employment can best be solved through open communication. Our Open

Door Policy has been established to resolve any disputes employees may have regarding Employer policies and practices by having disputes addressed by successively higher levels of management.

An employee who has a suggestion, challenge, or concern about an employment issue should first discuss it with his or her supervisor. If the concern cannot be fully resolved at this level or if there are special circumstances involved that make it difficult to speak to the supervisor, the employee should refer the problem to the next level of management in his or her area. Should the problem remain unresolved, the employee should refer the matter to the CEO.

6 - Classifications of Employment

HCSC maintains standard definitions of employment status and classifies employees for purposes of personnel administration and related payroll transactions according to the following definitions:

Full Time - Full-time employees are those employees who are hired to work HCSC's full time schedule of at least 40 hours per week. Full-time employees may be "exempt" or "non-exempt" as defined below.

Part Time - Part-time employees are those employees who are hired to work, normally scheduled to work, and do work less than 40 hours per week.

Exempt - Exempt employees are those whose positions meet specific tests established by the Fair Labor Standards Act (FLSA) and state law and who are exempt from overtime pay requirements. Executives, professional employees, outside sales representatives, and administrative positions are typically exempt. Exempt employees will be paid on a salary basis, which means that these employees will receive their full salary for any week in which they perform any work without regard to the number of days or hours worked. The Company, however, may make deductions from exempt employees' salaries for full-day absences when such employees do not have remaining paid time off. Any exempt employee who feels that an improper salary deduction has been made should alert the Director of Finance and Operations. All complaints will be investigated, improper deductions will be repaid, and good faith efforts will be made to assure improper deductions do not happen again.

Non-Exempt - Non-exempt employees are those whose positions do not meet FLSA exemptions tests and are subject to the overtime provision of the FLSA. These employees will receive time and one-half (i.e., one and one-half times) their basic hourly rate for all hours actually worked in excess of 40 hours in a work week. Hours worked do not include meal periods, vacation days, personal days, holidays or any leave of absence. All overtime hours must be requested by the employee's supervisor, authorized by the CEO and meet certain other requirements as detailed in the section "Overtime" later in the Personnel Code.

You will be informed of your initial employment classification and of your status as an exempt or non-exempt employee during your orientation session. If you change positions during your employment as a result of a promotion, transfer, or any other

legitimate reason, you will be informed by the CEO of any change in your exemption status.

7 - Work Day Schedules and Attendance

Based on the needs and requirements of HCSC's clients, schedules may fluctuate. Employees may have a changing schedule and may be required to work odd or additional hours in order to meet the demands of HCSC's mission.

Promptness is an essential requirement of each employee's job. If you expect to be late for work or absent for any reason, you must call and leave a message with your supervisor at or before 9 a.m. of that day. If there is no one at your supervisor's desk when you call, please leave a voice mail message and an additional email message for the CEO at jon@hebrewcharters.org as to when you'll be in and/or where you can be reached. Further, employees should make every effort to minimize lateness and interruptions during normal office hours. Doctor's visits, for example, should be scheduled during evenings or on weekends. Employees should schedule their 30-minute lunch breaks so that there is always coverage. Employees may not work through their meal periods without written permission from their supervisor. Except in the case of an emergency, all employees must have any time away from the office during normal office hours approved by the CEO.

Tardiness or absenteeism may result in disciplinary action, up to and including termination of employment.

8 - Formal Flexible Arrangements

Formal flexibility is a way of structuring a job that is different from traditional arrangements in terms of when and how work gets done. Because formal flexibility can affect daily operations, and because it is often applied on a long-term basis, employees applying for formal flexible arrangements must submit a written request and receive approval from both their supervisor and the CEO. Any formal flexible working arrangements must be approved in writing, and both the employee and his or her supervisor must execute a flexible work agreement that sets forth the terms and conditions of such arrangement.

HCSC understands that circumstances may arise where you may need to work remotely. In such an event, you must request the option to telecommute in writing to your supervisor. Your request may be approved or denied depending on client needs, performance, practicality, etc. Working from home for more than five business days will require proper documentation and supervisor and CEO approval. The availability of telecommuting as a flexible work arrangement can be discontinued at any time and for any reason at HCSC's sole discretion.

HCSC considers telecommuting as a voluntary flexible work alternative that may be appropriate for some employees and roles. Telecommuting allows an employee to work away from the office for all or part of their regular workweek. It is not an entitlement; it is not a Company-wide benefit; and it in no way changes the terms and conditions of employment with HCSC. An appropriate level of communication between the employee

and supervisor will be agreed to as part of the discussion process. Telecommuting is not designed to be a replacement for appropriate child care.

Telecommuting employees who are non-exempt will be required to record all hours worked in a manner designated by the organization. Hours worked in excess of those specified per day and per work week, in accordance with State and Federal requirements will require the advance approval of the supervisor. Failure to comply with this requirement can result in the immediate cessation of the telecommuting agreement and other disciplinary action.

Any telecommuting arrangement made will be on a trial basis for the first three months. The availability of telecommuting can be discontinued at any time at the discretion of HCSC, whether during or after the trial period. Every effort will be made to provide 30 days' notice of such a change to accommodate issues that may arise from such a change. There may be instances, however, where no advance notice is possible. Please contact your supervisor or the CEO for more information.

All flexible working arrangements may be terminated by the Company at any time, at its sole and absolute discretion.

9 - Overtime

Overtime may be necessary to address work overflows. Only "Non-Exempt Employees" are eligible for overtime pay. Exempt employees are exempt from the requirements of the FLSA and are not eligible for overtime pay.

All paid overtime for "Non-Exempt Employees" must be authorized in advance (in writing) by the CEO. The employee must also complete an overtime sheet on a daily basis when overtime is worked. Overtime pay will be provided only for actual hours worked by eligible Non-Exempt Employees as follows:

- ♦ Vacations, holidays, sick days, and other time off will not be counted in determining actual hours worked for purposes of calculating overtime pay; and
- ♦ Time worked in excess of 40 hours will be paid at the rate of one and one-half times the employee's regular hourly rate of pay.

10 - Performance Appraisal and Development System

HCSC believes it is beneficial to provide you with accurate and timely feedback on your performance strengths and weaknesses so that you may take appropriate actions in line with your career expectations.

Our appraisal and development process has been designed to provide you with a formal evaluation of your demonstrated performance as related to the specific requirements of your position. Your supervisor maintains primary responsibility for conducting the appraisal review. With the exception of newly hired, promoted or transferred employees, you will normally be reviewed once each year on or about the anniversary of your initial

hire date. The appraisal is primarily designed to assist you in better understanding how well you have performed your job and what you may need to do to attain greater success and advancement in the future. It is not a guarantee of any increase in wage or benefits or of continued employment.

HCSC's performance evaluation system in no way changes the employees' at-will employment status.

I 1 - Changes to Personnel Data

It is the responsibility of each employee to promptly notify HCSC of any changes in personnel data. Personal mailing addresses, telephone numbers, marital status, number and names of dependents, individuals to be contacted in the event of an emergency, educational accomplishment, and other such status reports should be accurate and current at all times. If any personnel data has changed, please notify the CEO and Office Services Manager immediately.

I 2 - Payroll Pay Periods and Pay Date

All employees are paid on a bi-weekly basis (26 pays per year) with a check date of every other Friday. Direct deposit is available for those employees who wish to take advantage of it.

I 3 - Deductions from Pay

HCSC will deduct Federal, state, and local taxes, as dictated by law. Additionally, paychecks may be offset by designated amounts for group benefits, retirement plans, and other items authorized by employees.

Nonexempt Employees - Nonexempt employees will be paid only for actual hours worked unless they receive benefits under our paid time off, vacation, sickness, medical, or other leave policies.

Improper Deductions from Pay - We will reimburse any exempt employee whose pay is reduced in violation of this policy. If you feel your pay has been improperly reduced please notify your supervisor.

I 4 - Disciplinary Action and Suspensions

HCSC will take disciplinary action that it deems suitable for the policy violation or issue. The disciplinary action may include, but is not limited to, warnings (both verbal and written), suspension, and termination. It is important to note that HCSC may suspend or terminate an employee without a prior warning, at its sole discretion. If an employee is suspended, the suspension will typically be without pay.

I 5 - Resignation and Termination

Due to the highly specialized and critical nature of the business, employees at the Director Level and above who resign must give at least one month's written notice to his/her supervisor. Employees below the Director Level must give at least ten (10) working days' written notice.

Employees are not permitted any paid time off during the notice period.

An employee who resigns without providing the required working notice set forth above will not be paid for any accrued but unused vacation pay upon termination. For those employees who do provide the required working days' notice, any outstanding earned vacation pay will be included in their final paycheck.

HCSC may schedule an exit interview at the time of termination or resignation. The exit interview affords an opportunity to discuss such issues as continuation of health benefits, repayment of outstanding debts to HCSC, or return of HCSC property.

SECTION II TIME OFF

I - Holidays

All full time employees will be granted the following days off as holidays when they fall on a weekday without loss of pay:

- ♦ New Year's Day
- ♦ Martin Luther King Day
- ♦ Presidents Day
- ♦ Passover (2 days)
- ♦ Memorial Day
- ♦ Independence Day
- ♦ Labor Day
- ♦ Rosh Hashanah (2 days)
- ♦ Yom Kippur (1 day)
- ♦ Thanksgiving
- ♦ Day after Thanksgiving
- ♦ Christmas Day

Temporary employees and part-time employees who work less than 40 hours per week are not eligible for paid holidays and must schedule their hours during the time that the office is open.

HCSC reserves the right to change this list of holidays at its discretion and to grant additional holidays in any given year on a “one-time” basis. Holidays are not cumulative and may be used only as they occur. Holidays falling within an eligible employee’s vacation period or other period of paid absence shall not be counted toward used vacation or other paid absence time, rather the employee shall receive the holiday pay. For employees working fewer than 5 days per week, holidays that fall on the employee’s scheduled day off will not be reimbursed. Paid time off for holidays will not be counted as hours worked for the purposes of determining overtime.

2 - Vacation

All full-time employees who work a minimum of 40 hours per week are eligible for Vacation Benefits. Vacation time accrues depending on one’s position and is articulated in one’s hire letter. For more detailed information, please see the Director of Finance and Operations. For full-time employees, vacation days are accumulated from the date of hire during the first partial year of employment, and on a calendar year basis thereafter. Full-time employees who work four full days per week are eligible for Vacation Benefits on a pro-rated basis. Part-time and temporary employees are not eligible for vacation benefits.

Paid vacation days may not be taken during the first two months of employment.

Vacation time is paid at the employee's base pay rate at the time of vacation. It does not include overtime or any special forms of compensation such as incentives, commissions, bonuses, or shift differentials, where such exist.

An employee on leave of absence for thirty (30) days or more will not accrue vacation. Vacation accrual will resume upon the employee's return to work.

To request vacation time, an employee must consult with his/her supervisor to insure that adequate coverage is available during the time desired. If the employee's supervisor approves his/her vacation scheduling request, a Leave Form request must be submitted to the CEO at least two (2) weeks in advance for processing and approval. HCSC reserves the right to deny any requests. In particular, HCSC reserves the right to deny a request to take three (3) or more consecutive weeks' vacation time if such an absence will seriously impact work flow or a program's progress. Requests for such absences must be made at least two (2) months in advance, and employees must help plan for coverage during their absences.

Employees may carry over up to a maximum of ten (10) total accrued, unused vacation days from one calendar year to the next. Any vacation days in excess of ten (10) shall be forfeited at that time. Payment for accrued, unused vacation days upon resignation is subject to each employee providing the working notice required under the Resignation and Termination section of this Handbook. Employees involuntarily terminated by HCSC shall be paid for any accrued, unused vacation days as of the termination date.

3 - Sick Days

All full-time employees are eligible for sick days, which are accumulated at the rate of .83 days per full calendar month (ten (10) days per calendar year). Part-time employees who work less than 40 hours per week will accumulate sick days on a pro-rated basis. Paid sick days may not be taken during the first two months of employment. Temporary employees are not eligible for paid sick-day benefits under this policy.

Sick leave benefits will be calculated based on the employee's base pay rate at the time of absence and will not include any special forms of compensation, such as incentives, commissions, bonuses, or shift differentials, if any. Sick leave benefits will be used to supplement any payments that an employee is eligible to receive from state disability insurance, workers' compensation or HCSC-provided disability insurance programs. The combination of any such disability payments and sick leave benefits cannot exceed the employee's normal weekly earnings.

Any continuous absence due to illness or injury of five days or more must be documented by a doctor's note, verifying the disability, and its beginning and expected ending dates. HCSC reserves the right to request a doctor's note from any employee out sick for three consecutive days as a condition for receiving sick leave benefits.

If not used in the calendar year accumulated, up to five (5) sick days per calendar year may be carried over and used in a subsequent year. However, the maximum number of

unused sick days that an employee may bank at any time is ten (10) days. Once employees reach the cap of 10 days, they will cease to accrue additional sick days until they reduce the balance below 10 days.

If you need a sick day or will be absent from work for any reason, you must call and leave a message with your supervisor at their email address at or before 9 a.m. of that day. If there is no one at the Executive Assistant's desk when you call, leave a voice mail message and an additional email message for the CEO at jon@hebrewcharters.org. Let us know when you will be in and where you can be reached. Three (3) consecutive days of absence without reasonably attempting to notify the office, will constitute voluntary resignation from employment as of the last day worked.

If you exceed your available sick days, vacation days may be used to make up the difference. You may not, however, exceed the total number of sick and vacation days.

Employees on leaves of absence for thirty (30) days or more will not accrue sick leave. Sick leave accrual will resume upon the employees' return to work.

Sick leave benefits are intended solely to provide income protection in the event of illness or injury, and may not be used for any other absence. Unused sick leave benefits will not be paid to employees upon termination of employment.

4 - New York City Earned Sick Time

New York City's Earned Sick Time Act generally provides that employees in New York City are entitled to one hour of paid sick time ("PST") for every thirty hours worked, up to a maximum of forty hours of sick time in a calendar year. To satisfy this requirement, employees are permitted to use their sick days for any of the Covered Reasons described below. Employees who are eligible for Company sick days are not eligible for additional PST under this policy.

Employees who are not eligible for sick days will accrue one hour of PST for every 30 hours worked, up to a maximum of 40 hours per calendar year. Such sick time will begin accruing immediately upon hire, but it may not be used until on or after the 120th day following the hire date. For purposes of this policy, exempt employees will be deemed to have worked 40 hours each workweek.

Unused PST may be carried over to the following calendar year, but eligible employees may not use more than 40 PST hours in any calendar year. Employees will not be paid for accrued, unused PST upon termination of employment or at any other time.

When there is a separation from employment and the employee is rehired within six months of separation, previously accrued unused PST will be reinstated and such employee will be entitled to use such accrued sick time at any time after such employee is rehired.

PST may be used for absence from work due to the following reasons ("Covered Reasons"): (a) an employee's mental or physical illness, injury or health condition or need for medical diagnosis, care or treatment of a mental or physical illness, injury or health

condition or need for preventive medical care; or (b) care of a family member who needs medical diagnosis, care or treatment of a mental or physical illness, injury or health condition or who needs preventive medical care; or (c) closure of the office by order of a public official due to a public health emergency or such employee's need to care for a child whose school or childcare provider has been closed by order of a public official due to a public health emergency.

Eligible employees must provide reasonable notice of use of PST. Where such need is foreseeable, employees must give at least seven days prior notice. Where such need is not foreseeable, employees must provide notice as soon as practicable.

For an absence of more than three consecutive work days of PST, eligible employees may be required to provide reasonable documentation that the PST was used for a Covered Reason.

Eligible employees who assert their rights to receive PST will not be retaliated against.

Eligible employees will receive all paid sick leave required by law, and this policy will be interpreted and applied, in accordance with New York City's Earned Sick Time Act, regulations thereunder, and all other applicable laws, and to the extent that this policy may conflict with those laws they are controlling over these policies. Further, the Company retains all rights and defenses under applicable law, whether or not specifically set forth in this policy.

5 - Jury Duty and Court Attendance Leave

We will cooperate as much as possible to enable employees to fulfill their civic obligation of serving on jury duty. If you are a regular, full-time employee we will pay you at your regular rate of pay for the first ten (10) days of jury duty, minus any monies paid to you for serving as a juror, provided that you comply with the following rules:

- ◆ Immediately upon receipt of the notice or summons for jury duty, you must deliver a copy of such jury duty notice or summons to your supervisor.
- ◆ If you are excused from jury duty for any day or half day during the required period of service, you shall report for work.
- ◆ If you are called for jury duty, you shall give your supervisor proof of the days of such service.
- ◆ You will not receive jury duty pay for any day (or week) for which you receive pay for holidays or other leave or under any other employee benefit plan or policy
- ◆ Jury duty service will not be deducted from allowable sick leave.
- ◆ You must elect a call-in option, if available.
- ◆ If we are in a busy period of increased activity, you must attempt to postpone jury service until a period of less activity, or the Company may submit a request to the court to reschedule your jury duty service.

Exempt employees will continue to receive their pay during jury duty service, except that they will not be paid for any week, after the second week of service, in which they perform no work for HCSC due to continued jury service.

For those who do not qualify for the jury duty provision set forth above, HCSC will pay up to \$40 per day for the first three days of jury service.

6 - Military Leave

If you will be serving in the U.S. Armed Forces or the National Guard, you are entitled to a military leave of absence. Upon receipt of notice, employees should contact the Director of Finance and Operations for further information. The Company will pay you for a maximum of two weeks during a military leave (less any pay received from the military during such leave). Upon completion of your military service and timely notice of your intent to return to work, the Company will generally reinstate you to your position, a comparable position or the position you would have attained had you not gone out on leave, in accordance with applicable law.

In addition, you are entitled to an unpaid leave of up to ten (10) days if your spouse is a member of the armed forces who has been deployed during a period of military conflict to a combat theater or combat zone of operations (or a member of the National Guard or Military Reserves deployed during a period of military conflict), when the service-member is on leave from active duty. No special notice is needed. Please provide your supervisor with a request for such leave.

Employees may use any available paid time off for the absence. Continuation of health insurance benefits is available as required by USERRA based on the length of the leave and subject to the terms, conditions and limitations of the applicable plans for which the employee is otherwise eligible

This policy will be interpreted and applied in accordance with the federal Uniformed Services Employment and Reemployment Rights Act ("USERRA"), regulations thereunder, and all other applicable laws, and to the extent that this policy may conflict with those laws they are controlling over this policy.

7 - Witness and Crime Victim Leave

Employees may take time off if they are a victim of a crime, to appear as a witness or consult with the district attorney. Employees also may take time off to attend court if they are subpoenaed to attend a criminal proceeding as a witness or making a victim statement in a criminal sentencing. Under some circumstances, employees may take time off to attend family court, including applying for a protection-from-abuse order or enforcing that order if the employee is the victim of domestic abuse. And employees may take time off to work with prosecutors in preparing a victim impact statement. Employees must notify the Company of the need for time off for any of these reasons prior to the absence. Employees who do so will not be penalized for such absence(s). Employees may use available paid time off or take such days as unpaid.

Upon request of the Company, an employee taking time off under this policy must provide verification of the employee's service.

8 - Voting Leave

If a registered voter does not have sufficient time outside of his or her regular working hours within which to vote at any election, he or she may, without loss of pay for up to two hours, take off sufficient time in the beginning or at the end of the regular work day to vote. If the polls are open for at least four consecutive hours either before or after your regular work day, you will be deemed to have sufficient time outside of your regular work day to vote.

If you need working time off to vote, you must notify your supervisor not more than ten nor less than two working days before the day of the election that you need time off to vote.

9 - Marital Leave

HCSC will provide one (1) day of paid leave to a full-time employee who is getting married plus one (1) additional day of paid leave if the wedding ceremony takes place on a work day. For any additional leave, the employee must use accrued but unused vacation days (accrued sick days cannot be used towards marital leave). Marital leave is available only to employees who have been employed by HCSC on a full-time basis for twelve (12) or more consecutive months.

10 - Personal Leave

The Company at its sole discretion will consider granting an unpaid leave of absence for up to two (2) months to a regular, full-time employee for extenuating personal reasons. Requests for personal leave without pay are considered individually and granted or denied in the sole discretion of management. The reason for the request, the employee's length of service, the employee's work record and the demands of the individual's job are examples of the type of factors typically considered in evaluating a request for personal leave of absence. A request for personal leave of absence will be granted only if the employee is not eligible for any other type of leave.

An employee requesting personal leave must submit such a request in writing to the CEO specifying the anticipated starting and ending dates of the leave, as well as the reasons for the leave. If the reason for the personal leave of absence is foreseeable, you must submit your request thirty days in advance of the anticipated starting date. If it is impossible to provide such advance notice, you must submit your request as soon as practicable.

Prior to a personal leave, the Company will notify you of the effect of such leave on your benefits. Except as so notified, during a personal leave you will not accrue any employee benefits or paid time off of any kind.

Upon returning from a personal leave of absence, reinstatement is not guaranteed.

However, the Company will make an effort to allow you to return to your former position (if it is available) or another available position for which you are qualified. Please note that business conditions, among other reasons, may preclude reinstatement.

If you fail to return to work after an approved unpaid personal leave and are not authorized to take any additional leave time, your position at the Company will be considered abandoned. This will be treated as a voluntary termination of employment on your part.

Please note that, except as otherwise required by law or as agreed to between the Company and the employee, an employee's total leave time generally may not exceed six months in a twelve month period. If you are on a leave of absence that exceeds six months in a twelve month period, the terms of your leave will be reviewed and your ability to return to work will be discussed with you. At such time, the Company may choose to extend your leave, request that you return to work, or terminate your employment. Failure to timely return from any authorized leave of absence will be considered job abandonment and will be treated as a voluntary resignation of employment.

Employees may not, under any circumstances, engage in other employment or a competitive business while on a leave of absence under this policy.

11 - New Parent Leave

Regular, full-time employees who have been employed with the Company for at least 1 year and who are Primary Caregivers (as defined below) may take up to six (6) weeks paid leave and six (6) weeks unpaid leave upon the birth of their child, adoption by them of a child or placement with them of a foster child. Regular, full-time employees who have been employed with the Company for at least 1 year but who are not a Primary Caregiver may take up to three (3) weeks of paid leave upon the birth of their child, adoption by them of a child or placement with them of a foster child. Any such leave shall run concurrently with any applicable disability leave.

Regular, full-time employees who have been employed with the Company for less than 1 year and who are Primary Caregivers (as defined below) may take up to three (3) weeks paid leave and nine (9) weeks unpaid leave upon the birth of their child, adoption by them of a child or placement with them of a foster child. Regular, full-time employees who have been employed with the Company for less than 1 year but who are not a Primary Caregiver may take up to one (1) week of paid leave upon the birth of their child, adoption by them of a child or placement with them of a foster child. Any such leave shall run concurrently with any applicable disability leave

“Primary Caregiver” is generally defined as an individual who has exclusive care responsibility for the child for a significant fraction of the day during the regular work week, but the definition will vary across family situations, as determined by the Company.

Paid parental leave must be used within 3 months following the birth, adoption or placement. Paid parental leave is provided to employees who are expected to return to work.

The Company may request reasonable assurance of return from paid parental leave and may deny such leave when such assurances are not provided.

12 - Compassionate Leave

Subject to the approval of HCSC, a full-time employee may take a leave of absence with pay on the following basis:

- ♦ Up to seven (7) work days, in any consecutive twelve (12) month period in the event of an emergency arising out of the death(s) or serious illness(es) of an immediate family member. Immediate family member is defined as a parent, parent in law, child, spouse, significant other, sibling, or grandparent.
- ♦ Up to three (3) work days, in any consecutive twelve (12) month period to attend the funeral(s) of an uncle, aunt, daughter-in-law, son-in law, mother-in-law, or father-in-law.
- ♦ Up to one (1) day to attend the funeral(s) of any other family member.

Bereavement pay is calculated based on the base pay rate at the time of absence and will not include any special forms of compensation, such as incentives, commissions, bonuses, or shift differentials, if any.

Bereavement leave will normally be granted unless there are unusual business needs or staffing requirements. Employees may, with their supervisors' approval, use any available paid leave for additional time off as necessary.

13 - Leave for Blood Donation

Employees seeking to donate blood will be given a three-hour unpaid leave of absence once in any twelve-month period. Leave taken for onsite blood donations or offsite donations scheduled by us will be paid and we will not require you to use accumulated vacation, personal, sick or other already existing leave time. We will require you to show proof of your blood donation in the form of a notice of blood donation (or of a good faith effort to donate) from the blood bank. Leave taken for offsite donations not scheduled by us is unpaid. If you intend to donate blood offsite, you must provide us with at least three (3) working days' notice of your need for leave. If you attend to participate in a blood drive taking place onsite or at some other time and place set by us, you must provide us with notice of your need for leave at least two (2) days prior to the day on which the leave will be taken. The Company will allow such leave on shorter notice if an employee experiences an emergency requiring that he or she donate blood for his or her own surgery, or that of a family member. Employees who desire to utilize this leave should consult with their supervisor.

14 - Leave for Bone Marrow Donation

The Company will grant leaves of absence to any New York-based employee who works, on average, more than twenty (20) hours per week to undergo a medical procedure to donate bone marrow. The combined length of such leaves shall be determined by the employee's physician, but may not exceed twenty-four work hours, unless agreed to by

the Company. The Company will require verification by a physician for the purpose and length of each leave requested by the employee to donate bone marrow. The Company will not retaliate against any employee for requesting or obtaining a leave of absence in accordance with this policy.

15 - Accommodation of Nursing Mothers

We will provide nursing mothers with reasonable break time daily for up to three years from her child's birth to allow her time to express breast milk. We will provide a room or other private location, other than a toilet stall, close to her work area for the expression of breast milk. Any employee who needs this accommodation should consult with her supervisor. HCSC will not retaliate against any employee who requests and/or utilizes time off to express breast milk.

SECTION III EMPLOYEE BENEFITS

I - General

Below is a list of benefits that the Company currently offers to employees. Details of these benefit plans and programs are described in summary plan description booklets (SPDs) and other documents, which employees are provided once they are eligible to participate in these plans. Complete details of our plans are contained in official plan documents, such as insurance contracts and master plan documents.

The Company anticipates continuing to make available to its employees the benefits described in this section, but benefits, plans and programs may be modified, added or terminated at any time by the insurance company or benefit provider, per the terms of the plan, or by the Company at its sole discretion.

For more information regarding the employee benefits program, please contact the Director of Finance and Operations.

In addition to the benefits described below, the Company currently offers:

- ◆ Medical Insurance
- ◆ Dental Insurance
- ◆ Vision Plan
- ◆ 403(b) Plan
- ◆ TransitChek

2 - Workers' Compensation and Disability

Injuries suffered on the job, no matter how minor the injury may appear, should be immediately reported to the employee's supervisor. If an employee should suffer a serious work-related injury, he/she should request completion of workers' compensation insurance forms from the Director of Finance and Operations. In such a situation, the employee should contact his/her supervisor immediately and then the supervisor should direct the employee to the Director of Finance and Operations. Your failure to report a workplace injury or illness may jeopardize your workers compensation claim.

SECTION IV RULES AND REQUIREMENTS

HCSC is a collaborative effort, made possible through our relationships with our donors, partners, network schools, and our reputation within the public school community.

Because of the relationship HCSC has with its partners and the community, HCSC employees are in a unique position of constantly representing HCSC. Our employees are the face of the organization, working with teachers, parents, children, community leaders, and influential people in a variety of roles. HCSC employees may work directly with children, being placed in a position of trust.

The varied sources of funding that support HCSC also create additional emphasis on everyone associated with HCSC being in a position to impact HCSC significantly. Our partners and donors make a conscious choice to invest in HCSC's mission and we reinforce their commitment by our ethical and professional action towards the mission.

Employees have a responsibility to positively represent HCSC in all that they do. The high standards for personal conduct, both professional and personal, come with the unique position that we are in. HCSC expects that its employees will always behave in such a way as to provide a positive example for students, families, teachers, and our partners. The following information is provided as a guide:

I- Employee Conduct

As an integral member of the Company, you are expected to accept certain responsibilities, adhere to acceptable business practices, and exhibit a high degree of personal integrity at all times. This includes refraining from any behavior that might be harmful to you, your co-workers, and/or the Company. You are encouraged to observe the highest standards of professionalism at all times.

These guidelines are fundamental in nature and are matters of judgment and common sense. Since it is impossible to list guidelines to cover every situation, the absence of an illustration from this list will not prohibit the Company from taking disciplinary action, up to and including immediate dismissal when the Company believes, in its sole discretion, such action is warranted. These guidelines do not in any way alter your at-will relationship with the Company. This means the Company may terminate your employment at any time with or without cause or notice.

The Company expects you to follow rules of conduct that will protect the interests and safety of all employees and the Company. Types of behavior and conduct the Company considers inappropriate include, but are not limited to:

- ◆ Falsifying employment or other Company records;
- ◆ Violating the Company's nondiscrimination and/or employee harassment policy
- ◆ Unauthorized use or disclosure of client or Company confidential information;
- ◆ Breach of financial interest or supplier relationship policies;

- ◆ Excessive or patterned absenteeism or tardiness;
- ◆ Excessive, unnecessary, or unauthorized use of Company supplies or telephones, particularly for personal purposes;
- ◆ Reporting to work intoxicated or under the influence of non-prescribed drugs, or possession, use, distribution, manufacture, sale, or dispensation of any controlled substance or illegal drug;
- ◆ Fighting or using obscene, abusive, or threatening language or gestures;
- ◆ Stealing from clients, the Company, or fellow employees, misappropriation of the assets of the Company or failure to report knowledge of such acts;
- ◆ Possession of firearms or weapons on the Company's premises or while on Company business;
- ◆ Disregarding safety or security regulations;
- ◆ Insubordination; i.e., failure to comply with a request from management;
- ◆ Failure to notify your manager that you will be absent from work in accordance with Company policy;
- ◆ Defacing or damaging Company property;
- ◆ Interfering with normal workflow, productivity or morale of a co-worker;
- ◆ Any action whatsoever that has the potential to negatively affect good relations between the Company and its employees or between the Company and any of its clients or suppliers; and
- ◆ Any violation of Company policy, whether set forth in this Handbook or otherwise.

Should your performance, work habits, conduct or demeanor become unsatisfactory in the sole judgment of the Company, based on either violations of the above, any other Company policies, rules or regulations, or for any other reason in the discretion of the Company, you will be subject to disciplinary action, up to and including termination.

2- Responsibility to Report and Confidentiality

For all of the reasons described above, it is important that HCSC be aware of any potential negative representation of the HCSC. Employees therefore have a responsibility to notify the CEO of any potential negative consequences or publicity as a result of, or a potential byproduct of, an employee's actions. Any potential or perceived conflict of interest, public dispute, client complaint or dissatisfaction, negative representation in the press (including online media), or anything else that has the potential to impact HCSC's reputation, must be immediately reported to the CEO.

The CEO, along with HCSC's Board of Directors, has the primary responsibility for managing outside communication that represents HCSC as a whole. Should an issue arise that has a potential impact on HCSC's reputation and mission, the CEO will be the primary point of contact for all inquiries and employees must honor the confidentiality and value of a consistent message.

3 - Dress Standards

Because physical presentation is a means of communication and self-expression, employees should thoughtfully present themselves. Given the diversity of roles each employee plays at HCSC, we expect staff members to dress appropriately for anticipated activities in any given day. All employees are required to report for work in clean clothing and footwear. All personnel should maintain good grooming and personal hygiene. Employees should refrain from wearing sloppy, unkempt, or overly revealing clothing. When meeting with people from outside the organization (both on-site and off-site), employees should make every reasonable effort to dress in a manner that meets the expectations of those with whom they are meeting. For example, when visiting a school, employees should dress at a level of formality consistent with that of leadership at that school. If employees are ever in doubt about what attire is appropriate for a given meeting or work activity, they should consult with their supervisor; they should also err on the side of more formal business attire.

Without unduly restricting individual tastes, the following personal appearance guidelines should be followed every day:

- ◆ Tank tops, oversized and commercial t-shirts, tube or halter-tops, torn jeans, form fitting leggings or tights without skirts, shorts, beach or picnic type attire may not be worn under any circumstances.
- ◆ Exposed midriffs and very low cut necklines are unacceptable during normal business hours.
- ◆ Offensive body odor and poor personal hygiene are not professionally acceptable.
- ◆ Tongue studs and torso body piercing with visible jewelry must not be worn during business hours.
- ◆ Visible excessive tattoos and similar body art must be covered during business hours.

4- Smoking Policy

HCSC is committed to enforcing the provisions of the New York State Public Health Law, regarding smoking in the workplace. Accordingly, HCSC prohibits all smoking on its premises. This policy applies equally to all employees and visitors.

5 - Business Travel and Related Expenses

Based on job requirements, some employees will be required to travel on a frequent basis. As such, those employees are expected to be available to travel as necessary and it is their responsibility to attend to personal affairs so that travel is not unduly restricted. Employees must receive advance written approval from the CEO prior to scheduling any business travel.

All employees are expected to exercise good business judgment when incurring travel and business expenses. Employees are entitled to reimbursement for ordinary and

reasonable expenses incurred while engaged in HCSC business (this does not include baby sitting or child care costs). If employees use their car for visiting sites/communities, mileage reimbursement will be according to current IRS regulations. All requests for reimbursement of business expenses must be submitted on a monthly basis in compliance with the procedures adopted by HCSC, including necessary documentation and or receipts of business expenses. Extraordinary expenses which are expenses other than would be reasonably anticipated prior to going on an HCSC mandated trip, must be approved in advance by the CEO.

All employees normally are expected to travel coach or economy class and to stay and eat in moderately priced establishments while traveling on HCSC business.

Airfare: To secure a lowest fare, book tickets as far in advance as possible, optimally 7-21 days prior to flight. Official documentation, (an electronic ticket receipt or a paper receipt verifying ticket number and airfare and boarding pass stubs) must be supplied to the Director of Finance and Operations to account for the expense.

Ground Transportation: Common carrier transportation will be utilized for trips, provided suitable scheduling is available. Employees are expected to exercise prudence in their selection of local transportation to their destination. When practical, employees are expected to use personal cars or public transportation for short-distance travel.

When renting a car on business travel, the vehicle should be rented under the corporate name with the employee listed as a driver only. HCSC also recommends that you purchased the liability and loss damage waiver. For individual travelers, it is appropriate to secure a car up to an intermediate (midsize) class. The next size class may be rented when three or more people are traveling together. Whenever possible, refuel the rental car before drop-off. Employees are encouraged to submit receipts with the completed reimbursement form immediately upon returning from their business trip.

Car service should be used for travel to and from local airports, and only when public transportation is not feasible or available. If car service is the only available option when traveling to/from a New York City airport, the following are the maximum reimbursable caps before tip and tolls, not including waiting times or sales tax: EWR: \$55, JFK: \$55, LGA: \$40. Employees in transit to airports from outside the five boroughs may spend up to an additional \$55 each way as the greater distance increases the fees. Employees are encouraged to submit receipts with the completed reimbursement form immediately upon returning from their business trip.

Employees using personal vehicles for business travel (aside from commuting) will be reimbursed at the current IRS allowable rate per mile. In the case that an employee's principal place of business is his or her home, transportation from there to work meetings is reimbursable by the organization. The employee is expected to have appropriate insurance coverage as required by state law and the employee will need to provide proof of insurance for both rental and personal car use. Parking expenses related to business travel are reimbursable with a receipt.

Traffic and parking fines are not reimbursable.

Taxis may be used for business-related travel where a suitable and less expensive form of

public transportation is not readily available. For employees who do not live in New York, it is customary to take a taxi from the airport to your hotel and back when on business in New York.

All taxi fares and tips must be documented with a receipt for reimbursement.

Outside of New York, airport, hotel and other types of “shuttle” services must be used when available.

Taxi fares between home and the office are a personal expense and are not reimbursable.

Meals: The cost of reasonably priced meals, snacks and drinks while traveling on business is reimbursable. Per meal guidelines exist to help employees stay within the maximum allowance and to assist employees who submit expenses for partial day travel. The individual meal reimbursement amounts and the maximum daily total are indicated in the chart below.

Employees will not be reimbursed for expenses above the maximum daily allowance or the per meal allowance. Employees must submit all original receipts with their reimbursement form.

If international travel will not permit you to eat on the outlined budget, request a modification to this schedule in advance from the Director of Finance and Operations. Expenses may only be reimbursed up to the pre-approved limits.

6 - Outside Employment

HCSC feels that if an employee chooses to take outside employment, he/she should be allowed to do so, provided any outside employment does not compromise the employee’s job performance and ability to fulfill any of his/her responsibilities to HCSC, which include availability for work and for overtime when necessary. The employee is required to inform and receive approval from his/her supervisor before accepting any outside employment.

The outside position must in no way be detrimental to HCSC. Further, employees may not work for direct competitors of HCSC. Employees who have their own businesses must disclose such interest to HCSC. In general, outside work activities are not allowed when they:

- ♦ Interfere with the employee’s full performance of the work for which he or she is employed by HCSC, including overtime assignments;
- ♦ Involve organizations that are going to seek to do business with HCSC, including actual or potential vendors or customers;
- ♦ Violate provisions of law or HCSC’s policies or rules; or
- ♦ Trade on the HCSC’s intellectual property or trade secrets.

Failure to disclose secondary employment and/or continuation of employment with a secondary employer that has been identified as a conflict of interest or as compromising the employee's job performance and/or ability to fulfill any of his/her responsibilities to HCSC will be considered grounds for immediate dismissal.

HCSC may revoke permission for an employee to engage in any outside employment at any time, at its sole and absolute discretion.

Training and Career Development

HCSC is committed to professional development to meet HCSC and community needs; to assist employees to do their current jobs effectively; and to prepare them for additional responsibilities and promotion within HCSC and the nonprofit sector. In addition to orientation for new employees, HCSC provides staff development programs and opportunities, within available resources, for all categories of regular employees, using internal and external resources.

7 - Return of HCSC Property

Location	Meal Reimbursement Amount	Maximum Daily Total for meals
Boston, Chicago, DC, LA, Las Vegas, NYC, Philadelphia, San Diego, San Francisco, and international locations	Breakfast \$12 Lunch \$18 Dinner \$35	\$65
All American cities not listed above	Breakfast \$10 Lunch \$15 Dinner \$35	\$55

At any time upon HCSC's request, or when Employees leave HCSC for any reason, they are required to return all HCSC property, including, but not limited to, equipment, keys, files, laptops, books, identification cards, telephones, and credit cards.

8 - Computer, Email and Internet Usage

We provide computer and communication systems to support the conduct of our operations. These systems may include: PC's, software, telephone, voicemail and electronic mail systems, all centralized computer equipment, networks and access to the Internet. Although limited personal use of our system is allowed, subject to the restrictions out-

lined below, no use of these systems should ever conflict with the primary purpose for which they have been provided or applicable laws and regulations. Each user is personally responsible to ensure that these guidelines are followed.

All data in our computer and communication systems (including documents, and other electronic files, e-mail and recorded voicemail messages) is our property. We may inspect and monitor such data at any time. We may also monitor usage of the Internet by employees, including reviewing a list of sites accessed by an individual.

No individual should have any expectation of privacy for messages or other data recorded in our system, including documents, e-mails or messages marked "private", which may be inaccessible to most users but remain available to us. The deletion of a document or message may not prevent our access to the item or completely eliminate the item from the system. Likewise, no individual should have any expectation of privacy in terms of their usage of the Internet. In addition, we may restrict access to certain sites that it deems are not necessary for our purposes.

Our computer and communication systems may not be used to create, transmit, access, receive, print, download or solicit material that is derogatory, obscene, sexually explicit or offensive, such as slurs, epithets, or anything that may be construed as harassment or disparagement based on race, color, national origin, citizenship, sex, sexual orientation, disability, age or religious or political beliefs. For example, the display or transmission of sexually explicit images, messages, jokes and cartoons is not allowed.

Similarly, our system may not be used to solicit or proselytize others for commercial purposes, causes, outside organizations, chain messages or other non-HCSC related purposes. Likewise, employees should not download or disseminate copyrighted material, load or execute unlicensed software on our computers or conduct any other activity in violation of applicable law or regulations.

Employees must not deliberately erase or damage our computers or data prepared in our computers.

General e-mail Policy and Procedures

Our e-mail system is in place as a tool for communications and is for our benefit and our employees, including those users performing tasks related to our mission. In order not to impair the systems capabilities but to also increase its efficiency the following policies and procedures are being conveyed.

Confidentiality

Our confidentiality policy applies to all computerized information including information on the e-mail system. Employees must not permit others to have unauthorized access to the e-mail system.

Internet Downloads and Limited Storage Capacity

Internet downloads, to be included as attachments or as e-mails, are not acceptable unless they are of HCSC related nature. (Examples of inappropriate downloads: music,

animated videos, writings, screen savers, art clippings, junk e-mails, etc.) These downloads have been responsible for occupying large areas of disk space and present the risk of virus contamination.

Receiving Pictures/Graphics/Images and Importing Operations

Receiving or downloading pictures, cartoons, animated videos, and or graphic displays of a non-HCSC related matter is not acceptable under this policy. These items require abundant disk space capacity to house them and these resources have limitations.

Data Security

Refrain from using the e-mail system as a medium to transfer our confidential, copyrighted, or licensed material to unauthorized recipients. E-mails containing such material must be cleared through a supervisor.

E-mail Files

Employees are responsible for “archiving” and “purging” their e-mails on a regular basis.

If an employee receives unwanted e-mail spam, inform the network administrator immediately. Do not try to unsubscribe to these e-mails as responding to them simply confirms the e-mail address is valid. We will take appropriate action to block receipt of these e-mails.

If an employee receives pornographic spam, do not open the e-mail and do not distribute it to other employees or friends. Report the situation to the Director of Finance and Operations.

General Internet Policy

Our Internet access system is in place as a medium for reference and research of topics related to HCSC operations. Employees must be aware that usage of the Internet is subject to the same code of conduct that applies to all other actions in the workplace.

In order to protect our information, employees must not share their passwords with any other individuals, including other employees or outsiders. Nor is it appropriate to attempt to subvert network security either by accessing the Internet without using your password or be seeking to discover other passwords to gain access.

Employees should remember they are our representatives when using our Internet account. Accordingly, they are expected to act and to communicate professionally on the Internet.

As owner of the Internet account, we will have access to a log of all usage including a list of employees who have used the Internet and the sites they visited. We will monitor this usage from time to time. Employees are prohibited from abusing usage or using the Internet inappropriately.

Employees are prohibited from accessing the Internet with HCSC computers and/or on

our time to develop or submit resumes for positions with other companies.

Copyrighted Material

Employees should not distribute copies of any information containing a copyright symbol: ©. Any questions about whether information can be copied and/or distributed should be discussed with a supervisor before downloading the information in question.

Chat Rooms

Employees will not be permitted to visit chat rooms or bulletin boards or post to them during working hours. Employees are prohibited from posting any HCSC information on financial bulletin boards or chat rooms whether the information is positive or negative unless specifically authorized to do so by HCSC.

Day Trading

We recognize that many brokerage services now allow trading via the Internet. While we will permit employees to occasionally check their accounts or submit trades, we will not tolerate individuals who engage in “day trading” during working hours. In addition, we do not guarantee that our system contains all the necessary security precautions that are advisable for employees transferring sensitive financial information to personal accounts. Therefore, we will not bear any liability for errors or theft that may occur due to an employee’s trading via our computers.

Non-HCSC Related Usage

Access to the Internet is provided to all our employees but should be limited to topics related to HCSC. Internet game sites, X-rated sites, and other sites displaying information or graphics deemed offensive by a general consensus of the public should not be accessed.

Game Playing

Playing Internet video games of any sort during work hours is not permitted.

Instant and Text Messaging

Employees have the ability to send text messages over their cell phones. Employees who spend too much time engaged in text messaging will be subject to disciplinary action, which may include prohibiting the employee from bringing a cell phone into the workplace.

Employees should be aware that it is possible to obtain transcripts of instant messages sent on company cell phones. We reserve the right to review any transcripts of instant messages to take appropriate action, including disciplinary action, against employees who send messages that violate other HCSC policies. The prohibition of harassment policy is one example of HCSC policy that could be violated by the content of instant messages, although it is not the only policy that may be violated.

If any PDA, Smart Phone or other such device is provided to you by HCSC, or you use any such device to access HCSC's networks or systems, you acknowledge and agree that all material sent, received or stored on the device is HCSC's property. You further consent to HCSC's use of any available GPS tracking capabilities for such devices.

Revocation of Internet Privileges and other penalties for violating HCSC policy

An employee's Internet access privileges will be revoked if it is found that he/she has misused it to break existing laws or our policies. Violation of our computer, Internet or e-mail policies will result in discipline, up to and including termination and an individual may be civilly liable for such action. Employees must immediately notify their supervisor upon learning of a violation of these policies by other employees.

9 - Personal Mobile Device Policy

The Company may provide certain employees with the ability to use their personal device(s) (e.g., iPhone, tablet, iPad, Android, etc.) in order to access Company email and/or networks (such devices are "Personal Devices").

However, the Company must take certain steps to confirm that Company and client information will be kept secure and confidential. Therefore, if you wish to use your Personal Device to access Company email or networks, then you must be aware of, and agree to, the following:

1. **Setup and Activation** – In order to enable your personal device to access your Company email account, the Company must get access to your device to configure the mail settings. Depending upon your device type, this could include providing your device to the third party IT provider to configure access to the Company's email system and install such software as it deems necessary.
2. **Remote Deletion/Deactivation** – If your Personal Device is lost, stolen or misappropriated, or the Company otherwise believes (in its sole discretion) that a risk to the security, confidentiality or misuse of Company or client information is possible, the Company reserves the right to remotely wipe the Personal Device, in whole or in part, without prior notice to you. This may mean that your Personal Device is temporarily disabled and/or that any and all Company and personal information will be permanently deleted from the device.
3. **No Tech Support** - The Company does not accept liability nor will it be held liable for any loss of personal data on any personal device. You are solely responsible for backing up your personal information. The third party IT service provider will not provide technical support services for personal devices (other than with respect to Company email).
4. **Personal Device Agreement** – The Company may require employees to sign a Personal Devices Agreement containing additional requirements prior to allowing such employee to use a Personal Device to access Company email or networks.

10 - Mobile Phone Expenses

Employees are expected to be in regular contact with HCSC, its staff, and clients. This means that employees should routinely check voice mail and email and response times should generally be within one business day.

In order to ensure to facilitate communication, HCSC will provide employees with an expense reimbursement for applicable voice and data charges. The amount of reimbursement will vary based on position, full or part-time status, amount of travel, and other factors. Employees and management will come to an agreed upon maximum reimbursement, based on historical and anticipated usage. It is important to note that employees should proactively manage their mobile phone plan to avoid overage charges. HCSC will not be responsible for excessive charges based on a lack of planning or attention.

11 - Mobile Phone Usage in Automobiles

While engaged in HCSC business, no employee is to engage in the use of a mobile phone nor may they text while operating a motor vehicle that is in motion, unless such mobile phone is equipped and used with a hands-free device. (The only exception to this policy is where a phone call is made in a bona fide emergency, such as a call to "911" or a similar emergency number or to call an ambulance, etc., provided the employee complies with all applicable laws).

Even with a hands-free device, during the course of HCSC business, mobile phone usage should be kept to a minimum; conversations should be as brief as possible and, even with a hands-free device, mobile phone calls should be made when the vehicle being operated by the employee is not in motion. Texting is never permitted while operating a motor vehicle during the course of HCSC business.

Employees using mobile phones should always remember not to discuss confidential issues with others present who do not have a need to know such information and mobile phone courtesy should be practiced at all times, i.e., when others are present, do not talk loud or in a manner that could be offensive to others. Remember mobile telephones are not secure and information relayed on a mobile phone can be intercepted quite easily.

12 - Compliance With Laws

All employees must comply with all applicable laws and regulations applicable in the country, state and local jurisdictions in which the Company conducts business. Employees are expected to learn the laws of the localities in which they work and to seek advice from the Company's CEO if they have any concerns regarding applicable laws and regulations.

13 - Community Affairs – Public Relations

All official policy or position statements of HCSC are made only in accordance with specific HCSC policy. Employees must refrain from giving the impression their views and positions are endorsed by HCSC or by its co-employees. Personal statements on controversial issues must indicate they are not HCSC policy.

Only those employees who are duly authorized to speak to the media, to analysts, or in public gatherings on HCSC's behalf may speak or write in its name to any news group or chat room. Other employees may participate in news groups in the course of business when relevant to their duties, but they do so as individuals speaking only for themselves. Where an individual participant is identified as an employee of HCSC, the employee must refrain from any unauthorized political advocacy and must refrain from the unauthorized endorsement or appearance of endorsement by HCSC of any commercial product or service not sold or serviced by HCSC

The CEO reserves the right to review communications regarding HCSC operations, policies and personnel. To ensure consistent standards, all requests from government agencies or city and state officials must be brought to the CEO's attention. All internal reports are not to be sent out under any circumstance unless approved by the CEO. No employee is to make a call, send a letter, issue a release, or send information to any television or radio station, newspaper or news outlet without clearing material with the CEO.

Any staff member who wishes to be members of professional committees, organizations, alliances which will require time away from regular job functions, should consult the CEO as to frequency and responsibility of these outside positions.

14 - Media Relations Policy and Guidelines

The news media are frequently interested in our work as well as in the broad sectors of education in general and charter schools in particular. We have a responsibility to be open and responsive to their information requests because the media are among the many ways our constituents build their individual perceptions of HCSC and the work we do in the communities we serve.

All media calls or similar requests for information must be referred to the Marketing/Communication (Mar/Com) Office. Employees are strictly prohibited from providing any information to publish or provide any HCSC information to the press or any third party without the express written permission of Mar/Com.

Purpose & Scope

This policy exists to assure that information disclosed by HCSC is timely, accurate, comprehensive, authoritative and relevant to all aspects of HCSC. Adherence to this policy is intended to provide an effective and efficient framework to facilitate the timely dissemination of information. This media policy applies to all employees of HCSC and covers all external news media, including broadcast, electronic and print, as well as social media.

HCSC Spokesperson

The Marketing/Communication (Mar/Com) office is designated as the principal media contact for HCSC and works with leadership to determine the appropriate spokesperson for the given topic. This department has expertise in media relations and weighs

each media inquiry to determine the best way to provide information in relationship with other information that is not yet public.

Marketing/Communication Responsibilities

- ♦ Increase public awareness and understanding of HCSC, the services that we provide our constituencies and our future prospects for growth.
- ♦ Promote a positive public image of HCSC and the work we do to the audiences that are important to us, which includes existing and prospective students, school faculty, our employees and vendors, as well as government officials, colleague organizations, and our industry peers.

Depending on the situation, an individual external to Mar/Com may be asked to be a spokesperson on a particular issue due to their knowledge, experience and expertise. Mar/Com will work with that designated spokesperson to prepare him/her for the media interview as needed.

Preparation may include developing talking points as well as counseling, training and practicing for the interview.

Guidelines for Talking with the Media

Refer all media calls to Mar/Com. Please do not say you are not allowed to talk to a reporter or have to get permission to do so. Instead, tell the reporter (you can paraphrase): “Our policy is to refer all media inquiries to our Marketing/Communication office. You can reach them at 212-792-6235 or via email at morris@hebrewcharters.org.”

A reporter, producer or other news media may contact you for a number of reasons, for example:

- ♦ To get information about HCSC or one of its schools.
- ♦ To get information about a recent unexpected event such as federal, state or local regulatory actions; etc.
- ♦ To get information or comment about an action or event that could impact our sector; new competitive entrants, new service launches, changes in government or organizational policies.
- ♦ To get general information on a topical story in our sector; such as changes in local governmental officials or policies, problems or issues specific to the community we serve, etc.

Whenever taking a call from the media, the same courtesy and professionalism in which we approach all of our constituents should be displayed toward the media. Please act quickly when approached by the media to ensure that the reporter’s deadline is met. This is important because the way this call is handled may be the reporter’s first impression of HCSC and that first impression may end up in the story published or the news segment broadcast. In order to promote our positive image, it is important to respond quickly, courteously and professionally to all media calls.

Please remember to contact Mar/Com if and when you have been approached by the media. Even though you have referred the media, Mar/Com may need your help to prepare a response. Do not let a reporter compel you to answer questions on the spot. It is always beneficial to prepare in advance in order to provide accurate and relevant information.

Photographs and Film

A similar process as described above will be used when someone from the media is requesting permission to take photographs or to film inside our facilities or at one of our schools.

Refer the caller to Mar/Com. No one will be given access to your facility for a photo or filming without approval from Mar/Com, and equally important, Mar/Com will not give approval without talking in advance with the manager of the facility. This is a joint decision between the facility and Mar/Com.

Decisions will be based upon a number of considerations including but not limited to:

- ◆ What does HCSC have to gain from the photo and filming?
- ◆ How much disruption will this cause to operations?
- ◆ What is the physical condition of the facility?
- ◆ Does the facility look “camera-ready?”

A reporter or camera crew may show up unannounced at our offices or one of our schools. This is most likely to occur in crisis situations at one of our facilities or within one of the communities we serve. Or, it could occur if the media learned about an event on our premises from an external source who has organized a demonstration or boycott.

Please know that Mar/Com will not send the media to any organizational operating facility without prior approval by the facility manager. When dealing with reporters and camera crews who may show up unannounced, the facility manager and staff should act with the same courtesy and professionalism as we approach all constituents. Contact Mar/Com immediately and let them know which news source is there. Mar/Com will contact the camera crew’s news room or the print photographer’s editor for clarification. We cannot prevent the filming or photographing of common areas outside of our facilities which we do not operate. Examples would include public parking lots, courtyards and walk ways.

The following guidelines should be used when television camera crews or print photographers show up unannounced:

- ◆ Although we cannot prevent the media from photographing or filming the exterior of our facilities, we will contact their news room and/or editors for clarification.
- ◆ The media cannot enter our facility to photograph or film without permission.
- ◆ The media cannot block the entrance to our facility or prevent people from entering our facility or conducting business as usual.

- ◆ We can inform the media if our constituents complain about the inconvenience caused in the parking lot or walkways.

Be courteous and friendly, but also remember that no matter how congenial or affirming the reporter, photographer or camera crew are, everything you say and do may be observed and reported by the media representative who is trying to make the setting come alive for his/her audience.

Guidelines for Seeking Media Coverage

In circumstances in which you believe you have a positive news story to share with the public, contact Mar/Com. It is the only department authorized to distribute HCSC news releases, pitch coverage of particular events or hold news conferences.

- ◆ Never call a reporter directly without first consulting Mar/Com.
- ◆ Mar/Com will work with you to gather information and determine if and how the news media should be contacted. Similar measures used by editors and reporters will be considered to determine if your story is newsworthy.
- ◆ Some news items may be more appropriate for internal publicity such as the HCSC donor newsletter or other forms of communication.

Social Media Guidelines

The Company understands that many employees maintain personal websites (including pages on social media such as Facebook) and/or blogs, and utilize other social media websites (such as Twitter and LinkedIn) (collectively, “Social Media”), or post on the websites or Social Media of others (including via Internet message boards, YouTube, chat groups, or otherwise). In general, the Company views personal Social Media positively, and it respects the right of employees to use them as a medium of self-expression. However, the Company expects employees to adhere to the following with regard to Social Media:

- ◆ Posting to, editing or browsing personal Social Media from Company computers is subject to the Company’s standard policies relating to use of its electronic equipment. Among other things, Company computers may not be used (a) to initiate or forward harassing, pornographic or indecent material, (b) to infringe upon anyone’s intellectual property or other rights, or (c) to violate any laws. As with email and Internet use, please limit your personal Social Media use while at work or while using Company hardware, software or servers.
- ◆ You should have no expectation of privacy in any information or communications that you enter or post using the Company’s hardware, software or networks, and the Company has the right to monitor all actions taken using its equipment.
- ◆ Posting to or otherwise engaging in Social Media on behalf of the Company or a client should be treated the same as any other official communications created by the Company and done only with the prior consent of the Company or client, as applicable.
- ◆ You must clearly disclose your relationship with the Company and/or its client(s)

if posting messages to Social Media about the Company and/or its client(s). For example, do not write about a Company client's product or service, even in a favorable way, without stating that the client is one of the Company's clients and that you work for the Company. Failure to do so may, in certain circumstances, constitute a violation of the FTC's Guides Concerning the Use of Endorsements and Testimonials in Advertising.

- ◆ If you identify yourself as an employee of the Company or discuss matters related to our business on Social Media, you must make it clear to your readers that the views you express are yours alone and that they do not necessarily reflect the views of the Company, unless you have received permission to make an official Company posting.
- ◆ You must ensure that all statements about the Company or its clients (or the client's products or services) are truthful and substantiated when posting messages to Social Media about the Company (or the Company's products or services).
- ◆ Do not criticize, defame or disparage the Company's clients, or their product or services, on Social Media.
- ◆ Keep any personal Social Media entirely separate from the Company's Social Media.
- ◆ Although the Company respects your interest in free expression when posting to or maintaining Social Media on your own time, what you say or post online may nevertheless subject you to corrective employment action, including termination of employment (except as prohibited by applicable law).
- ◆ You may not disclose any information that is confidential or proprietary to the Company or to any third party that has disclosed confidential information to us.
- ◆ Please remember that the Company and/or its clients owns the concepts and developments that you produce in connection with your employment. You may not post or otherwise use any intellectual property belonging to the Company or its clients unless you have written approval from Company management.
- ◆ If requested to do so by the Company, you must provide the Company the names of any Social Media to which you have posted information about and/or made reference to the Company, its clients or any of their products or services.
- ◆ When using any Social Media, you must always comply with such Social Media's terms of service, acceptable use policy and any other posted guidelines.
- ◆ The Company (or its client(s), as applicable) own all websites and other Social Media sites that any employee develops or creates in connection with their employment with the Company, regardless of in whose name the site or Social Media is registered.
- ◆ If you become aware of any violation of this policy by any other Company personnel, you are required to notify the CEO immediately. If you have any doubts as to whether it's okay to post a particular piece of information, feel free to discuss the matter with the CEO; ultimately, however, you have sole responsibility for what you choose to post to Social Media.
- ◆ Remember your day job. Engagement in social media will vary, depending on its relevance to the employee's job at the organization. Discuss with your supervisor how much of your job – if any – necessitates your on-the-job participation in social networking of any sort, and act accordingly.

Violations of any of HCSC's Media Relations Policy & Guidelines may result in disciplinary action, up to and including termination.

15 - No Solicitation/Distribution

In order to avoid interference with your work, and the work of others, solicitation for any purpose by employees during working time is discouraged. An employee's "work time" does not include the employee's break periods or mealtime.

Solicitation or distribution of materials on our premises by non-employees will not be permitted without prior written approval by the CEO or her designee.

16 - Reference Checks

Employees are prohibited from providing any references (positive or negative) for any current or former employees in any medium, including, for example, LinkedIn. All requests for references must be directed to the CEO. The Company will only verify position(s) held, and dates of employment.

17 - Recording Devices in the Workplace

Our clients and colleagues trust in our discretion. As such, employees are prohibited from recording or photographing clients or fellow employees in the workplace or during working time. Violations of this policy may result in immediate discipline (including the possibility of termination), immediate removal of the recording device and/or the employee from the workplace, and retention of the recording device for inspection by the company and/or legal authorities. Exceptions will apply when the employee in possession of the recording device has been provided advance written authorization to use the recording device by an authorized member of Company management and the recording device is being used in an authorized manner to further Company business. Additionally, the Company reserves the right to make video, audio or other recordings of Company employees in the workplace. As such, employees should have no expectation of privacy while on any job site.

18 - Substance Abuse

The Company recognizes a responsibility to help provide a safe and productive work environment for all employees. We believe that working under the influence of alcohol or illegal drugs can affect an employee's productivity and efficiency and jeopardize the safety of the employee, co-workers and the public.

The Company will not tolerate, and absolutely prohibits, the use, possession or being under the influence of an illegal drug (1) on Company property, (2) when the employee is performing Company business off premises, or (3) when activity away from Company premises or business affects the employee's suitability for continued employment or may harm the reputation of the Company or its employees. "Illegal drugs" are drugs or controlled substances which are (1) not legally obtainable, or (2) legally obtainable, but not obtained in a lawful manner.

Employees must report any conviction under a criminal drug statute for violations occurring on Company premises or while conducting Company business. This includes a plea of no contest. A report of a conviction must be made within five days after the conviction.

In addition, even legal drugs may affect the safety of the employee, co-workers or members of the public. Therefore, employees should not report to work under the influence of any legal drug that might affect their safety or the safety of others. “Legal Drugs” are those prescribed or over-the-counter drugs that are legally obtained by the employee and used for the purpose for which they were prescribed and sold.

The Company also prohibits the consumption of alcohol on Company premises and being under the influence of alcohol while on Company property. However, alcohol may be served at appropriate business social events for employees of legal drinking age who choose to drink it in moderation, but only with advance approval by the Company President. All employees are required to obey state and local laws concerning drinking and driving.

The Company reserves the right to require employment candidates and existing employees to submit to a drug or alcohol test, except as prohibited by applicable law.

19 - Proprietary Rights

The employee must give proper attribution to any and all proprietary materials prepared by or for HCSC that he uses or distributes. In addition, any material such as manuals, documents, plans, reports, drawings, pictures and inventions that the employee prepares for use with a HCSC school/community is the sole property of HCSC. HCSC proprietary materials are the sole property of HCSC and intended for use by the employee only for the purpose of furthering the goals and objectives of HCSC. The use of HCSC materials beyond this purpose is governed by exclusive arrangement with HCSC on a case by case basis. Any permission must be obtained in writing from the CEO. The proprietary list of HCSC materials shall include HCSC's donors and clients and other HCSC contacts.

20 - Conflict of Interest Policy

Employees have an obligation to conduct business in a way that avoids any actual or potential conflicts of interest. This policy, however, establishes only the framework within which the Company wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee, or for a person related to that employee, as a result of the Company's business dealings. For the purposes of this policy, a relative is someone related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage. An actual or potential conflict of interest may also occur when an employee's

non-work activities divert their attention from their Company job responsibilities.

The mere existence of a relationship with outside firms will not necessarily create a conflict of interest. However, if an employee has any influence on transactions involving purchases, contracts, or leases, it is imperative that the employee disclose to the Company as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm or vendor with which the Company does business, but also when an employee or relative receives any compensation, gifts, or special consideration as a result of any transaction or business dealings involving the Company. Employees should not accept anything other than nominal gifts in connection with their employment with the Company.

A conflict of interest may also occur when an employee or relative of an employee has an ownership or other profit interest in a competitor of the Company or one of its clients. Employees should disclose to their managers any such ownership interests that may be perceived as a conflict of interest.

Please note that even the appearance of a conflict, even when there is no actual conflict, can cause problem for an employee and the Company. The interests of both the Company and its employees are best served when employees disclose and discuss any possible conflict of interest issues with their managers so that appropriate action may be taken to avoid even the appearance of impropriety.

21 - HCSC Whistleblower Policy

I. **PURPOSE.** - This Whistleblower Policy will serve to safeguard high standards of organizational and personal ethics in the Hebrew Charter School Center (the "Corporation"). It will encourage all trustees, officers, employees and agents to practice honesty and integrity in fulfilling their responsibilities and to comply with all applicable laws and regulations. Toward that end, this policy addresses the submission by trustees, officers, employees and agents of complaints, concerns, and suspected violations with respect to one or more of the following matters:

- Questionable financial practices.
- Compliance with legal and regulatory requirements.
- A violation or suspected violation of the Corporation's conflict of interest policy.
- A retaliatory act against an individual who reports a suspected violation of any of the above.

II. **RESPONSIBILITIES OF THE BOARD OF DIRECTORS WITH RESPECT TO SPECIFIED COMPLAINTS** - The Board of Directors of the Corporation (the "Board") will receive, retain, investigate, and act on complaints and concerns ("Reports") regarding:

- Questionable financial practices, including, but not limited to, the misuse of the Corporation’s assets, the circumvention or attempted circumvention of accounting procedures or internal controls, or conduct that would otherwise constitute a violation of the Corporation’s financial policies (each, a “Financial Allegation”);
- Compliance with legal and regulatory requirements (“Legal Allegation”); and
- Retaliation against individuals who make Financial Allegations or Legal Allegations (“Retaliatory Act”).

III. PROCEDURES FOR MAKING COMPLAINTS/REPORTING VIOLATIONS - Complaints, concerns and suspected violations should be reported to a member of the Board.

IV. PROCEDURES FOR RECEIVING REPORTS - Any Report that is made directly to any trustee or officer, whether openly, confidentially or anonymously, will be promptly reported to the Board. Concerns expressed anonymously will be investigated to the extent possible. However, anonymity could become an obstacle to full review and resolution of a concern by the Corporation and therefore an individual may be asked to provide certain additional identifying details in order for the Corporation to conduct a thorough investigation of their allegations.

The Board will notify the complainant – if his/her identity is known – and acknowledge receipt of the Report within seven days.

Each Report forwarded to the Board, and each Report that is made directly to the Board – whether openly, confidentially or anonymously – will be reviewed by the Board. The Board will have discretion to consult with anyone who is not the subject of the allegation and may have appropriate expertise to assist the Board. The Board will determine whether to investigate the Report, taking into account the considerations set forth in Section V below.

If the Board determines that it should investigate the Report, the Board will promptly determine what professional assistance, if any, it needs in order to conduct the investigation. The Board will be free in its discretion to engage outside auditors, counsel or other experts to assist in the investigation and in the analysis of results.

V. CONSIDERATIONS IN DETERMINING WHETHER THE BOARD SHOULD INVESTIGATE A REPORT - In determining whether the Board should investigate a Report, the Board will consider, among any other factors that are appropriate under the circumstances, the following:

- Who is the alleged wrongdoer?
- How serious is the alleged wrongdoing?
- How credible is the allegation of wrongdoing?

VI. PROTECTION OF WHISTLEBLOWERS

Non-retaliation. The Corporation, including the Board, and the officers, will not retaliate and will not tolerate any retaliation by any other person or group, directly or indirectly, against anyone who, in good faith, makes a Report or provides assistance to the Board or any other person or group, including any governmental, regulatory or law enforcement body, investigating a Report.

An officer, trustee or employee who retaliates against someone who has reported a violation is subject to discipline up to and including removal from the office or from the Board or termination of employment.

Confidentiality. The Corporation, including the Board, and the officers, will not, unless compelled by judicial or other legal process, reveal the identity of any person who makes a Report or provides assistance to the Board, including any governmental, regulatory or law enforcement body, in investigating a Report and who, in each case, asks that his/her identity as the person who made such Report or provided assistance in connection with such Report remain confidential. The Board also will not make any effort, or tolerate any effort made by any other person or group, to ascertain the identity of any person who makes a Report anonymously.

VII. RECORDS - The Corporation will retain for a period of seven years all records relating to any Report and investigation.

ACKNOWLEDGMENT OF RECEIPT OF EMPLOYEE HANDBOOK

I have received my copy of HCSC 's revised Employee Handbook, which outlines the personnel policies of HCSC. I will read the handbook, familiarize myself with the information in the Handbook and agree to observe these policies and procedures in all respects. I understand that I should consult the CEO regarding any questions related to or not answered in the Handbook.

I have entered into my employment relationship with HCSC voluntarily and I acknowledge that my employment is At Will. I understand that the Handbook does not constitute a contractual agreement, that my employment is not set for any specific duration, and that I or HCSC may terminate my employment at any time for any reason.

I understand that no employee or representative of HCSC, other than the CEO, has any authority to enter into any employment agreement for a specified period of time or to make any promises or commitments contrary to the foregoing. Further, any such agreement, if made, shall not be enforceable unless it is in writing and signed by the CEO.

I acknowledge that revisions to the Handbook, policies, benefits or practices described in this Handbook may occur at any time, at HCSC's sole and absolute discretion with or without prior notice, except HCSC's policy of Employment At Will. Only the CEO of HCSC has the ability to adopt any revisions to the policies in this handbook.

I authorize the Company to monitor and/or record any and all communications made by me using Company computers, telephones, cell phones, Blackberry or similar devices, networks, Company-paid phone lines or any other Company equipment. Furthermore, I specifically acknowledge that I have thoroughly read HCSC's Harassment Policies and Complaint Procedure. I specifically agree to abide by the policies' requirements. I also agree that if there is any provision of any Company policy, that I do not understand, I will seek clarification from the CEO.

I have read the Rules and Requirements section and understand the unique position of HCSC within the community. I also understand the conflict of interest policy. To the best of my knowledge and belief, neither I nor any person with whom I have a personal, family or business relationship has a direct or indirect interest in or relationship to any individual or organization which proposes to enter into a transaction with HCSC, except for: _____.

If I find that I or any person with whom I have a personal, family or business relationship has a direct or indirect interest in any individual or organization which proposes to enter into a transaction with the above named organization, I will make full disclosure to the HCSC CEO of such interest before any discussion or negotiation of such transaction and shall not be present for any discussion, vote or exert any personal influence or take any other action, in connection with the matter.

Please acknowledge the above by signing below and returning this page to the CEO.

Employee's Signature

Date

Employee's Name (Please



HEBREW CHARTER SCHOOL CENTER

