

STRATEGIC TRADE RESEARCH INSTITUTE

HUMAN RESOURCES POLICY

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## **1. SCOPE**

The Strategic Trade Research Institute (STRI) HR Policy has been developed to provide general guidelines about STRI policies and procedures for employees. STRI will provide each individual a copy of this policy upon employment. Employees are expected to abide by it. The highest standards of personal and professional ethics and behavior are expected of all STRI employees.

Further, STRI expects each employee to display good judgment, diplomacy and courtesy in their professional relationships with members of STRI's Board of Directors, staff, and the general public.

## **2. VOLUNTARY AT-WILL EMPLOYMENT**

Unless an employee has a written employment agreement with STRI, which provides differently, all employment at STRI is "at-will." That means that employees may be terminated from employment with STRI with or without cause, and employees are free to leave the employment of STRI with or without cause. Any representation by any STRI officer or employee contrary to this policy is not binding upon STRI unless it is in writing and is signed by the Director with the approval of the Board of Directors.

## **3. EQUAL EMPLOYMENT OPPORTUNITY**

STRI shall follow the spirit and intent of all federal, state, and local employment law and is committed to equal employment opportunity. To that end, the Board of Directors and Director of STRI will not discriminate against any employee or applicant in a manner that violates the law.

STRI is committed to providing equal opportunity for all employees and applicants without regard to race, color, religion, national origin, sex, age, marital status, sexual orientation, disability, political affiliation, personal appearance, family responsibilities, matriculation or any other characteristic protected under federal, state or local law. Each person is evaluated on the basis of personal skill and merit.

STRI's policy regarding equal employment opportunity applies to all aspects of employment, including recruitment, hiring, job assignments, promotions, working conditions, scheduling, benefits, wage and salary administration, disciplinary action, termination, and social, educational and recreational programs. The Director shall act as the responsible agent in the full implementation of the Equal Employment Opportunity policy.

STRI will not tolerate any form of unlawful discrimination. All employees are expected to cooperate fully in implementing this policy. In particular, any employee who believes that any other employee of STRI may have violated the Equal Employment Opportunity Policy should report the possible violation to the Director.

If STRI determines that a violation of this policy has occurred, it will take appropriate disciplinary action against the offending party, which can include counseling, warnings,

suspensions, and termination. Employees who report, in good faith, violations of this policy and employees who cooperate with investigations into alleged violations of this policy will not be subject to retaliation. Upon completion of the investigation, STRI will inform the employee who made the complaint of the results of the investigation.

STRI is also committed to complying fully with applicable disability discrimination laws and ensuring that equal opportunity in employment exists at STRI for qualified persons with disabilities. All employment practices and activities are conducted on a non-discriminatory basis. Reasonable accommodations will be available to all qualified disabled employees, upon request, so long as the potential accommodation does not create an undue hardship on STRI. Employees who believe that they may require an accommodation should discuss these needs with the Executive Director.

#### **4. POLICY AGAINST WORKPLACE HARASSMENT**

STRI is committed to providing a work environment for all employees that is free from sexual harassment and other types of discriminatory harassment. Employees are expected to conduct themselves in a professional manner and to show respect for their co-workers. STRI's commitment begins with the recognition and acknowledgment that sexual harassment and other types of discriminatory harassment are, of course, unlawful. To reinforce this commitment, STRI has developed a policy against harassment and a reporting procedure for employees who have been subjected to or witnessed harassment. This policy applies to all work-related settings and activities, whether inside or outside the workplace, and includes business trips and business-related social events.

STRI's property may not be used to engage in conduct that violates this policy. STRI's policy against harassment covers employees and other individuals who have a relationship with STRI which enables STRI to exercise some control over the individual's conduct in places and activities that relate to STRI's work (e.g., directors, officers, contractors, volunteers, etc.).

*Prohibition of Sexual Harassment:* STRI's policy against sexual harassment prohibits sexual advances or requests for sexual favors or other physical or verbal conduct of a sexual nature, when: (1) submission to such conduct is made an express or implicit condition of employment; (2) submission to or rejection of such conduct is used as a basis for employment decisions affecting the individual who submits to or rejects such conduct; or (3) such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile, humiliating, or offensive working environment.

While it is not possible to list all of the circumstances which would constitute sexual harassment, the following are some examples: (1) unwelcome sexual advances -- whether they involve physical touching or not; (2) requests for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment; or (3) coerced sexual acts. Depending on the circumstances, the following conduct may also constitute sexual harassment: (1) use of sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; (2) sexually oriented comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess; (3) displaying sexually suggestive

objects, pictures, cartoons; (4) unwelcome leering, whistling, deliberate brushing against the body in a suggestive manner; (5) sexual gestures or sexually suggestive comments; (6) inquiries into one's sexual experiences; or (7) discussion of one's sexual activities.

While such behavior, depending on the circumstances, may not be severe or pervasive enough to create a sexually hostile work environment, it can nonetheless make co-workers uncomfortable. Accordingly, such behavior is inappropriate and may result in disciplinary action regardless of whether it is unlawful. It is also unlawful and expressly against STRI policy to retaliate against an employee for filing a complaint of sexual harassment or for cooperating with an investigation of a complaint of sexual harassment.

#### *Prohibition of Other Types of Discriminatory Harassment:*

It is also against STRI's policy to engage in verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, gender, religion, sexual orientation, age, national origin, disability, or other protected category (or that of the individual's relatives, friends, or associates) that: (1) has the purpose or effect of creating an intimidating, hostile, humiliating, or offensive working environment; (2) has the purpose or effect of unreasonably interfering with an individual's work performance; or (3) otherwise adversely affects an individual's employment opportunities.

Depending on the circumstances, the following conduct may constitute discriminatory harassment: (1) epithets, slurs, negative stereotyping, jokes, or threatening, intimidating, or hostile acts that relate to race, color, gender, religion, sexual orientation, age, national origin, or disability; and (2) written or graphic material that denigrates or shows hostility toward an individual or group because of race, color, gender, religion, sexual orientation, age, national origin, or disability and that is circulated in the workplace, or placed anywhere in STRI's premises such as on an employee's desk or workspace or on STRI's equipment or bulletin boards. Other conduct may also constitute discriminatory harassment if it falls within the definition of discriminatory harassment set forth above. It is also against STRI's policy to retaliate against an employee for filing a complaint of discriminatory harassment or for cooperating in an investigation of a complaint of discriminatory harassment.

#### *Reporting of Harassment:*

If STRI staff believe that they have experienced or witnessed sexual harassment or other discriminatory harassment by any employee of STRI, they should report the incident immediately to their supervisor or to the Director. Possible harassment by others with whom STRI has a business relationship, including customers, vendors, or funders, should also be reported as soon as possible so that appropriate action can be taken.

STRI will promptly and thoroughly investigate all reports of harassment as discreetly and confidentially as practicable. The investigation would generally include a private interview with the person making a report of harassment. It would also generally be necessary to discuss allegations of harassment with the accused individual and others who may have information relevant to the investigation. STRI's goal is to conduct a thorough investigation, to determine whether harassment occurred, and to determine what action to take if it is determined that

improper behavior occurred.

If STRI determines that a violation of this policy has occurred, it will take appropriate disciplinary action against the offending party, which can include counseling, warnings, suspensions, and termination. Employees who report violations of this policy and employees who cooperate with investigations into alleged violations of this policy will not be subject to retaliation. Upon completion of the investigation, STRI will inform the employee who made the complaint of the results of the investigation.

Compliance with this policy is a condition of each employee's employment. Employees are encouraged to raise any questions or concerns about this policy or about possible discriminatory harassment with the Executive Director. In the case where the allegation of harassment is against the Director, please notify the staff member designated as grievance officer.

## **5. SOLICITATION**

Employees are prohibited from soliciting (personally or via electronic mail) for membership, pledges, subscriptions, the collection of money or for any other unauthorized purpose anywhere on STRI property during work time, especially those of a partisan or political nature. "Work time" includes time spent in actual performance of job duties but does not include lunch periods or breaks. Non-working employees may not solicit or distribute to working employees. Persons who are not employed by STRI may not solicit or distribute literature on STRI's premises at any time for any reason.

Employees are prohibited from distributing, circulating or posting (on bulletin boards, refrigerators, walls, etc.) literature, petitions or other materials at any time for any purpose without the prior approval of the Executive Director or his/her designee.

## **6. TRAINING**

STRI offers training for staff and contractors on an as-needed basis to ensure that skills and project demands match. It is expected that research assistants and researchers may have knowledge or skill gaps regarding specific topical areas. If these have been established during the interview process or once employment has begun, the supervisor or Director are responsible for providing the necessary training. STRI believes that investing in the training of staff is part of its mission and imperative for the professional growth of staff as well as successful completion of projects.

Staff are trained to understand STRI policies, including the HR policy, anti-fraud and anti-bribery policy, whistleblower policy, document retention policy, and conflict of interest policy. These policies form a part of our work culture.

## **7. HOURS OF WORK, ATTENDANCE AND PUNCTUALITY**

### **A. Hours of Work**

STRI does not impose set work hours on staff. STRI's policy is to trust staff to produce the best quality work in whichever circumstance best allows for it – taking into account that rest and a healthy work-life balance are essential to productivity. STRI encourages staff to pursue healthy habits that encourage work-life balance. Planned calls, meetings, and other communication shall take place at pre-determined times, and staff are expected to attend and be punctual. If staff cannot attend, or will be late, they must submit warning with enough advance time, and with reasonable grounds for their absence or tardiness.

Subject to STRI work assignments and Director approval, the employee's supervisor shall determine the hours of employment that best suits the needs of the work to be done by the individual employee.

STRI encourages staff to have open communication with their manager and/or the Director should they require any changes in their hours of work based on project requirements.

#### B. Attendance and Punctuality

STRI staff are given the flexibility to work from home or the location of their preference, unless as required by an on-site work trip, meeting, call, or other pre-determined event. Punctuality and regular attendance are expected of all employees in those circumstances. Depending on the circumstances, including the employee's length of employment, STRI may counsel employees prior to termination for excessive absences, tardiness or leaving early.

#### C. Overtime

Overtime pay, which is applicable only to Non-Exempt Employees, is for any time worked in excess of 40 hours in a work week. Only the Executive Director or his or her designee, upon the request of an employee's supervisor, may authorize overtime. Overtime rate is one and one-half time (1½) the employee's straight time rate, except in instances involving a Sunday or holidays when the rate is two times the regular rate. Payment of overtime will be provided in the pay period following the period in which it is earned.

### 8. EMPLOYMENT POLICIES AND PRACTICES

#### Definition of Terms

1. Employer. STRI is the employer of all full-time, part-time and temporary employees. An employee is hired, provided compensation and applicable benefits, and has his or her work directed and evaluated by STRI.
2. Full-Time Employee. A Full Time Employee regularly works at least 35 hours per week
3. Part-Time Employee. A Part Time Employee regularly works less than 35 hours per week but no less than 17 ½ hours per week.

4. Exempt Employee. An Exempt Employee is an employee who is paid on a salary basis and meets the qualifications for exemption from the overtime requirements of the Fair Labor Standards Act (“FLSA”).
5. Non-Exempt Employee. A Non-Exempt Employee is an employee who is paid an hourly rate and does not meet the qualifications for exemption from the overtime requirements of the Fair Labor Standards Act (“FLSA”). For Non-Exempt Employees, an accurate record of hours worked must be maintained. STRI will compensate non-exempt employees in accordance with applicable federal and state law and regulations.
6. Temporary Employee. An individual employed, either on a full-time or part-time basis, for a specific period of time less than six months. Temporary employees are entitled only to those benefits required by statute or as otherwise stated in the policies.

All employees are classified as Exempt or Non-Exempt in accordance with federal and state law and regulations. Each employee is notified at the time of hire of his or her specific compensation category and exempt or non-exempt status.

## **9. POSITION DESCRIPTION AND COMPENSATION ADMINISTRATION**

Each position shall have a written job description. In general, the description will include the: purpose of the position, areas of responsibilities, immediate supervisor(s), qualifications required, compensation, and working conditions affecting the job, e.g., working hours, use of car, etc. The supervisor(s) or the Executive Director shall have discretion to modify the job description to meet the needs of STRI.

Paychecks are distributed no more than one month after timesheets are received. Timesheets are due to the Executive Director before the end of the first week of the following month.

### **WORK REVIEW**

STRI expects its staff to perform work of high quality and rigor. The work of each employee is reviewed on an ongoing basis with the supervisor to provide a systematic means of evaluating performance. The purpose of the review is to encourage the exchange of ideas in order to create positive change within STRI. To that end, it is incumbent upon both parties to have an open and honest discussion concerning the employee’s performance. It is further incumbent upon the supervisor to clearly communicate the needs of STRI and what is expected of the employee in contributing to the success of STRI.

The Executive Director reviews the work of all supervisors. Work reviews for other staff are the responsibility of the appropriate supervisor, subject to confirmation by the Executive Director.

### **ECONOMIC BENEFITS AND INSURANCE**

STRI shall provide benefits to all eligible employees. The following outline of available benefits is provided with the understanding that benefit plans may change from time to time, and the plan brochures (known as Summary Plan Descriptions) or contracts are to be considered the final word on the terms and conditions of the employee benefits provided by STRI. For eligibility requirements, refer to the Plan document for each benefit program. Continuation of any benefits after termination of employment will be solely at the employee's expense and only if permitted by policies and statutes. The Executive Director will determine levels of deductibility and co-payments for all insurance related benefits annually.

## **10. REIMBURSEMENT OF EXPENSES**

Reimbursement is authorized for reasonable and necessary expenses incurred in carrying out job responsibilities. Mileage or transportation, parking fees, calls, and meal costs when required to attend a luncheon or meeting, are all illustrative of reasonable and necessary expenses.

Employees serving in an official capacity for STRI at conferences and meetings are reimbursed for actual and necessary expenses incurred, such as travel expenses, meal costs, lodging, tips and registration fees. When attending meetings that have been approved by the Executive Director, employees are reimbursed for travel expenses, course fees, and costs of meals and lodging at the current rates. Employees may also request a travel advance to cover anticipated expenses approved travel. Employees also may be granted leave to attend a conference or professional meeting related to their professional development, and/or STRI's current and anticipated work. Expenses for these purposes can be paid by STRI, if funds are available, and the employee obtains prior written approval of such expenses.

Transportation costs are paid by STRI for work outside normal work hours if the employee is on official business for STRI. Forms are provided to request reimbursement for actual expenses and advance payment for travel. Receipts must be provided for all expenditures made in order to claim reimbursement.

## **11. SEPARATION**

Either STRI or the employee may initiate separation. STRI encourages employees to provide at least two weeks (10 days) written notice prior to intended separation. After receiving such notice, an exit interview will be scheduled by the Director or his or her designee. The Director has authority to employ or separate all other employees.

Circumstances under which separation may occur include:

1. Resignation. Employees are encouraged to give at least 10 business days of written notice. Since a longer period is desired, the intention to resign should be made known as far in advance as possible.
2. Termination or Lay-off. Under certain circumstances, the termination or lay-off of an employee may be necessary.

The Executive Director has authority to discharge an employee from the employ of STRI. As stated above, all employment at STRI is “at-will.” That means that employees may be terminated from employment with STRI with or without cause, and employees are free to leave the employment of STRI with or without cause. Reasons for discharge may include, but are not limited to:

- Falsifying or withholding information on your employment application that did or would have affected STRI’s decision to hire you;
- Falsifying or withholding information in other personnel records including personnel questionnaires, performance evaluations or any other records;
- Performance at work below a level acceptable to STRI or the failure to perform assigned duties;
- Failure to complete required time records or falsification of such time records;
- Insubordination;
- Refusing to work reasonable overtime;
- Negligence in the performance of duties likely to cause or actually causing personal injury or property damage;
- Fighting, arguing or attempting to injure another;
- Destroying or willfully damaging the personal property of another, including STRI’s property;
- Breach of confidentiality;
- Using or appearing to use for personal gain any information obtained on the job, which is not readily available to the general public or disclosing such information that damages the interests of STRI or its customers or vendors;
- Placing oneself in a position in which personal interests and those of STRI are or appear to be in conflict or might interfere with the ability of the employee to perform the job as well as possible;
- Using STRI property or services for personal gain or taking, removing or disposing of STRI material, supplies or equipment without proper authority;
- Gambling in any form on STRI property;
- Dishonesty;
- Theft;

- Fraud, financial impropriety, bribery, undisclosed conflict of interest;
- Excessive tardiness or absenteeism whether excused or unexcused;
- Unauthorized absence from work without proper notice; and
- Engaging in discriminatory or abusive behavior, including sexual harassment.

At the sole discretion of the Executive Director, the employee may be asked to leave immediately or be given a period of notice.

## 12. RETURN OF PROPERTY

Employees are responsible for STRI equipment, property and work products that may be issued to them and/or are in their possession or control, including but not limited to:

- Credit cards,
- Office/building keys,
- Office/building security passes,
- Computers, computerized diskettes, electronic/voice mail codes, and
- Intellectual property (e.g., written materials, work products).

II. In the event of separation from employment, or immediately upon request by the Executive Director or his or her designee, Employees must return all STRI property that is in their possession or control. Where permitted by applicable law(s), STRI may withhold from the employee's final paycheck the cost of any property, including intellectual property, which is not returned when required. STRI also may take any action deemed appropriate to recover or protect its property.

## III. REVIEW OF PERSONNEL

Employees may request a review of a personnel action or an unsatisfactory performance review. Employees are expected first to discuss their concern with their immediate supervisor. If further discussion is desired, the employee may then discuss the situation with the Director. The decision of the Director is final.

## 13. PERSONNEL RECORDS

Personnel records are the property of STRI, and access to the information they contain is restricted and confidential. A personnel file shall be kept for each employee and should include the employee's job application, copy of the letter of employment and position description, performance reviews, disciplinary records, records of salary increases and any other relevant personnel information. It is the responsibility of each employee to promptly notify his/ or her supervisor in writing of any changes in personnel data, including personal mailing addresses,

telephone numbers, names of dependents, and individuals to be contacted in the event of an emergency.

#### **14. OUTSIDE EMPLOYMENT**

Individuals employed by STRI may hold outside jobs as long as they meet the performance standards of their job with STRI.

Outside employment that constitutes a conflict of interest is prohibited. Employees may not receive any income or material gain from individuals or organizations for materials produced or services rendered while performing their jobs with STRI.

#### **15. NON-DISCLOSURE OF CONFIDENTIAL INFORMATION**

Any information that an employee learns about STRI, or its members or donors, as a result of working for STRI that is not otherwise publicly available constitutes confidential information. Employees may not disclose confidential information to anyone who is not employed by STRI or to other persons employed by STRI who do not need to know such information to assist in rendering services.

The protection of privileged and confidential information, including trade secrets, is vital to the interests and the success of STRI. The disclosure, distribution, electronic transmission or copying of STRI's confidential information is prohibited. Such information includes, but is not limited to the following examples:

- Compensation data.
- Program and financial information, including information related to donors, and pending projects and proposals.

Employees are required to sign a non-disclosure agreement as a condition of employment. Any employee who discloses confidential STRI information will be subject to disciplinary action (including possible separation), even if he or she does not actually benefit from the disclosure of such information. Discussions involving sensitive information should always be held in confidential settings to safeguard the confidentiality of the information.

#### **16. INFORMATION SECURITY**

This section sets forth some important rules relating to the use of STRI's information systems. These systems include equipment and data provided to employees, all associated software, and STRI telephone, voice mail, and electronic mails.

All data in STRI's computer and communication systems (including documents, other electronic files, e-mail and recorded voice mail messages) are the property of STRI. STRI may inspect and monitor such data at any time. No individual should have any expectation of privacy for messages or other data recorded in STRI's systems.

STRI's systems must not be used to create or transmit material that is derogatory, defamatory, obscene or offensive, such as slurs, epithets or anything that might be construed as harassment or disparagement based on race, color, national origin, sex, sexual orientation, age, physical or mental disability, medical condition, marital status, or religious or political beliefs. Similarly, STRI's systems must not be used to solicit or proselytize others for commercial purposes, causes, outside organizations, chain messages or other non-job-related purposes.

The following activities, which present security risks, should be avoided.

- Attempts should not be made to bypass, or render ineffective, security facilities that protect STRI databases and information
- Passwords should not be shared between users. If written down, password should be kept in locked drawers or other places not easily accessible.
- Information of STRI databases should not be shared without permission.

There are a number of practices that individual users should adopt that will foster a higher level of security. Among them are the following:

- Turn off your personal computer when you are leaving your work area or office for an extended period of time.
- Exercise judgment in assigning an appropriate level of security to documents stored on the company's networks, based on a realistic appraisal of the need for confidentiality or privacy.
- Back up any information stored locally on your personal computer (other than network-based software and documents) on a frequent and regular basis.

Should you have any questions about any of the above policy guidelines, please contact the Executive Director.









