

newventurefund

1201 Connecticut Ave. NW, Washington, DC 20036

T: (202) 595-1061 F: (202) 833-5540

E: [info@newventurefund.org](mailto:info@newventurefund.org)

W: [www.newventurefund.org](http://www.newventurefund.org)

# EMPLOYEE HANDBOOK

REVISED APRIL 2019

## Table of Contents

Introduction.....	5
Welcome.....	5
About NVF.....	5
About Arabella Advisors .....	5
Terminology .....	5
About This Handbook .....	6
Disclaimers.....	7
Authority.....	7
Employment .....	7
Code of Ethics .....	7
Embezzlement and Misappropriation of Company Property .....	8
False Information .....	8
Forgery .....	8
Gifts and Gratuities .....	8
Representing New Venture Fund.....	9
Social Media .....	9
Child Protection .....	10
Staff Engaging with Minors .....	10
Background Checks .....	11
Training .....	11
Behavior Protocols .....	11
Reporting Concerns or Incidents.....	13
Consequences .....	14
Equal Employment Opportunity Policy.....	14
Employment Offers.....	14
Probationary Employment .....	15
Categories of Employment.....	15
Job Classifications .....	16
Interns and Volunteers.....	16
Verification of Eligibility to Work .....	17
Departing Employees.....	17
Voluntary Departures.....	17
Involuntary Departures .....	17
“Spinning” .....	18
Employee Protections.....	18
Discrimination & Anti-Harassment Policies .....	18
NVF Workplace Bill of Rights.....	18
Definitions.....	18
Incident Reporting Procedure.....	20
Outcomes .....	22
Support.....	23
Confidentiality.....	23
Board Reporting.....	23
Consensual Relationships.....	23
Workplace Violence Prevention .....	24
Accommodating Persons with Disabilities .....	24
Definitions.....	24
Break Time for Nursing Mothers .....	25
Whistleblower Policy .....	25
No Retaliation .....	25
Reporting Violations.....	25
General Counsel .....	26

Accounting and Auditing Matters .....	26
Acting in Good Faith.....	26
Confidentiality.....	26
Handling of Reported Violations.....	26
Work Environment .....	27
Workday.....	27
Flexible Work Arrangements.....	27
Safety .....	27
Confidentiality.....	28
Conflicts of Interest.....	28
Outside Work (“Moonlighting”).....	29
Information Technology Systems Policy .....	29
Email Privacy .....	30
Technology and Network Security .....	30
Technology Care.....	30
Drugs and Alcohol.....	30
Alcohol Consumption at Events .....	31
International Travel .....	31
Payroll and Benefits.....	31
Payroll .....	31
Timekeeping.....	31
Overtime .....	32
Lobbying and Political Activity .....	32
Wage Garnishments.....	32
Employee Benefits .....	32
Open Enrollment and Qualifying Life Events .....	33
COBRA Continuation .....	33
Workers’ Compensation Insurance.....	34
Discretionary Benefits.....	34
Mobile Phone Expenses .....	34
Fitness Benefit.....	34
Gifts for Employees.....	35
Paid Time Off (PTO) .....	35
Vacation Leave .....	36
Personal Leave .....	36
Donating Time .....	36
Volunteer Leave .....	37
Holidays.....	37
Comp Time .....	38
Leave Without Pay .....	39
Jury Duty .....	39
Bereavement Leave .....	39
Inclement Weather .....	39
Military Reserve Service.....	39
Disability & Parental Leave .....	39
Family and Medical Leave (FML).....	40
Performance Management .....	43
Employee Evaluations.....	43
Minimum Requirements and Guidelines .....	43
NVF Performance Resources.....	43
Promotions, Salary Increases, and Bonuses .....	43
Salary Discussions .....	44
Progressive Discipline .....	44

Expense Reimbursement and Travel Policies .....	45
Travel Policy Overview .....	45
Non-Reimbursable Expenses.....	46
Travel Reservation Procedures .....	46
Air Travel Reservations .....	47
Rental Car Guidelines .....	47
Domestic Rental Car Insurance .....	48
International Rental Car Insurance .....	48
Personal Car Usage Guidelines.....	48
Taxis and Local Transportation .....	49
Airport Transportation .....	49
International Calls .....	49
Hotel Reservations .....	49
Meals and Entertainment .....	50
Business Meal Expenses.....	50
Client Policies .....	50
International Expenses.....	50
Corporate Credit Cards .....	50
Corporate Credit Card Usage Benefits .....	51
Expense Reporting .....	51
Pre-Authorization.....	51
APPENDIX A: Benefits Eligibility by Employment Classification.....	52
APPENDIX B: Travel and Expense Reimbursement Reference Guide.....	53
APPENDIX C: Contact Information.....	54

# Introduction

---

## WELCOME

Welcome to the New Venture Fund (NVF). We are thrilled you have joined one of NVF's innovative public interest projects. NVF is committed to supporting the world's leading philanthropists and social entrepreneurs by providing expertise and the most efficient and effective platforms to eliminate barriers and deploy resources for social good. NVF is comprised of many other projects like yours, which vary widely in issue area, individual mission, and theory of change, and are geographically and culturally diverse. We believe that we will be more impactful by creating an organizational environment where all employees can thrive. To facilitate achieving both NVF's broad and project-based missions, we are committed to providing the expertise, tools, and guidelines that attract top talent, adhering to applicable laws and regulations, and protecting the interests of NVF and its projects. This handbook is designed to clarify policies and procedures and provide guidance that will help you navigate your employment with NVF and get the most out of your interactions with NVF Human Resources. We hope this handbook will help facilitate a smooth and streamlined work experience during your entire time with NVF.

## ABOUT NVF

The New Venture Fund, a 501(c)(3) public charity, was established in 2006 in response to demand from leading philanthropists for efficient, cost-effective, and time-saving project-implementation services. NVF offers support and facilitation for its projects—focusing on enhancing donors' ability to execute their visions. NVF executes a range of public interest projects that touch on all aspects of social welfare.

NVF offers domestic and international grant execution services, administers pooled donor funds, and provides comprehensive fiscal sponsorship services for innovative nonprofit projects. An independent board of directors with extensive experience in philanthropy and nonprofit management oversees the organization.

NVF is one of several managed nonprofit organizations that Arabella Advisors supports.

## ABOUT ARABELLA ADVISORS

NVF's board of directors has hired Arabella Advisors, a philanthropic consulting firm, to provide staffing and management services to NVF through an administrative services agreement. By tapping Arabella's expertise, NVF is able to operate more efficiently and to gain access to expert philanthropic strategy development, execution, and evaluation support services.

Arabella Advisors provides support to NVF projects via dedicated oversight by a managing director (MD), an account manager (AM), accounting and financial services, and human resources support.

Employees are employed solely by NVF and are responsible exclusively to NVF management.

## TERMINOLOGY

Throughout this handbook and your time at NVF, we will reference the following terms:

- **MNPO's** – These are the public charity organizations, including NVF, that Arabella supports through a variety of operational and management services. Other managed organizations

include at this time: the Hopewell Fund, the Windward Fund (both 501(c)(3) public charities), and the Sixteen Thirty Fund, a 501(c)(4). Using a fiscal sponsorship structure, these managed organizations house public interest projects and nonprofits, as well as coordinate collaborative initiatives between donors and administer grant programs. In the context of NVF's relationship to Arabella Advisors, the "Managed Organizations" (MO) team also refers to the group of Arabella staff specifically dedicated to supporting NVF and the other managed public charities.

- **NVF Human Resources (NVF HR)** – NVF provides human resources services via Arabella's dedicated team. The president has delegated authority to the head of the human resources to manage employment policy and labor law compliance, navigation of personnel matters, and management of payroll, benefits, policy, onboarding, terminations and performance systems. For managers and project directors, NVF HR can provide situational coaching, guidance on management best practices, job description and team capacity evaluations, and other strategic HR services, when requested.
- **Project** – This is the term for one of the various public interest initiatives within NVF (or one of the other managed organizations) for which each employee performs his/her day-to-day duties. You are working on one of NVF's projects.
- **Project director (PD)** – The project director is usually an employee of NVF hired to lead a Project, but may have a structurally different working relationship, is usually the project's primary liaison with NVF's account team, and is responsible for managing the project's overall programmatic activities, raising funds for the Project, and managing Project staff. Other titles may include executive director, president, program manager, program director, etc. Project directors may appoint a designee to liaise with NVF's account team.
- **NVF staff** – Both employees and volunteers who work on NVF projects and administration.
- **Account manager (AM)** – The account manager is the designated Arabella staffer who acts as a liaison to a given project. The AM is the project staff's first point of contact at NVF for all transactions and inquiries related to the project. In some instances, the account manager will have a team assisting.
- **Advisory Board** – The Advisory Board is the group of individuals who provide oversight for the Project and non-binding recommendations to NVF to ensure the Project achieves the desired impact.
- **The Portal** – The Portal is NVF's intranet. It contains important information for projects, such as policies and procedures for managing day-to-day project activities, tools for working efficiently with AM's, and important resources and materials to aid your work.

## ABOUT THIS HANDBOOK

This Employee Handbook sets forth employment-related policies, procedures, and benefits for the New Venture Fund. It is intended to establish a common understanding of NVF's policies, to clarify organization-wide systems, and to promote consistency in NVF's practices. All employees of NVF are responsible for understanding the contents of this handbook. Project directors are responsible for administering these policies in a consistent and impartial manner. Any policy not addressed in this handbook is at the discretion of each individual project director to set for his/her project. Project directors are responsible for creating and administering discretionary policies in a manner that is fair, consistent and in line with the values set forth in this handbook. In the event that a project policy is in conflict with or violation of an NVF policy, NVF's policy will prevail. Employees or project directors who violate the policies in this handbook may be subject to legal action and/or disciplinary action, up to and including termination.

If employees or supervisors have questions, comments, or suggested changes to this handbook, please contact NVF's head of human resources at [Gideon@newventurefund.org](mailto:Gideon@newventurefund.org) or [HR@newventurefund.org](mailto:HR@newventurefund.org). NVF leadership will periodically review the contents of this document for appropriate changes. Any change will be issued in writing as a new policy and will be distributed through electronic communications to all employees.

## **DISCLAIMERS**

This handbook is neither a contract of employment nor a legal document and should not be interpreted as a guarantee of employment.

All NVF employees are employees "at-will." As such, either the employee or NVF is free to terminate the employment relationship at any time for any lawful reason or no reason at all, with or without prior notice. No representative of NVF, other than the president or his/her designee, has the authority to enter into any written agreement for employment including for any specified period of time.

NVF's policies and procedures are not to be interpreted as promises or contracts of any kind. NVF may change or terminate these policies or procedures at any time. Additionally, NVF retains discretion to determine benefits eligibility and interpret the terms of each benefit, as well as to change or modify any of these benefit plans or programs at any time. The benefit plans and programs referenced in this document are further subject to the terms of the governing plan documents.

This handbook supersedes all previous employee handbooks or statements of policy related to its contents. If any terms of this handbook differ from an employee's offer letter, the terms of the offer letter will prevail. If this handbook differs from the applicable local or federal law, the terms of the law will prevail.

## **AUTHORITY**

The NVF board of directors has delegated day-to-day oversight responsibilities to the NVF president. In most cases, the NVF president is also the named supervisor for most project directors. Project directors who need to engage the NVF president on any matters related to the policies in this handbook should coordinate communications through the director of human resources.

# Employment

---

## **CODE OF ETHICS**

At NVF, we believe in personal behavior standards that respect the integrity and dignity of each individual, and we maintain high standards of ethical conduct. NVF and its representatives are committed to practicing honesty and integrity in fulfilling its responsibilities and complying with all applicable laws and regulations. Unlawful activity of any kind is prohibited. NVF leadership takes this Code of Ethics very seriously, and violations of this code will subject individuals to disciplinary action, up to and including termination.

NVF's Code of Ethics is intended to guide employees in areas where improper activities could result in serious adverse consequences to NVF, its projects, or its employees, or damage NVF's reputation.

Personal integrity and sound judgment are the basis of this code. Employees are expected to be forthright and honest with leadership, fellow employees, and those with whom NVF has relationships.

NVF's resources are to be obtained and used appropriately, including property, funds, proprietary information, and services. No employee may use NVF resources or relationships to obtain a personal advantage or benefit. Employees are expected to exert their best efforts to perform work to the highest standards of excellence, and to always engage in ethical business practices and follow all applicable laws.

Any employee who is requested to perform, authorize, or agree to anything in violation of this code must promptly report such information to his/her supervisor, project director, or NVF Human Resources. Any supervisor or project director receiving a report of a violation must relay this information to NVF HR.

Disciplinary action will be taken, not only against individuals who authorize or participate directly in a violation of this code, but also against:

- Any employee who deliberately fails to report or withholds information concerning a violation
- Any supervisors, project directors, or leaders on whom the violation reflects inadequate leadership or lack of diligence

#### **EMBEZZLEMENT AND MISAPPROPRIATION OF COMPANY PROPERTY**

Actions that involve wrongfully taking or using any NVF resource—including money, property, or the equivalent that has been entrusted to an employee's care—will be considered theft and/or embezzlement and are punishable by disciplinary action, up to and including termination, and possible criminal prosecution. Activities that fall into this category include, but are not limited to:

- Misuse of NVF funds or property
- Falsifying or cheating on expense reports
- Taking kickbacks or bribes
- Unauthorized possession of NVF property or another person's property

#### **FALSE INFORMATION**

Entering false or misleading information on any official NVF document is strictly prohibited. This includes, but is not limited to:

- Timesheets
- Expense reports
- Personnel records
- Permit applications or any other regulatory-required reports

#### **FORGERY**

Forging endorsements or approvals on any document or form, electronic or hard copy, or knowingly approving false invoices for payment constitutes forgery and/or embezzlement and is subject to disciplinary action, up to and including termination, and possible criminal prosecution.

#### **GIFTS AND GRATUITIES**

NVF discourages acceptance of business gifts or services from third parties by employees. Staff may occasionally accept refreshments of nominal value as a normal courtesy during the performance of job duties, as well as unsolicited advertising or promotional items of nominal value (e.g., coffee mugs,

fruit baskets, etc.). The acceptance of cash gifts is strictly prohibited.

### **REPRESENTING NEW VENTURE FUND**

In general, only staff with designated authority may represent NVF or its projects externally. Representative authority may be granted or removed at any time with or without notice. This policy is meant to provide guidance on navigating how you represent NVF or one of its projects.

Representation may come in the form of speaking at events, networking, field-building, writing thought pieces, speaking on the record, emailing, social media or otherwise communicating in such a way that a reasonable audience would infer that you are doing so in an official capacity. NVF staff should always clearly state the project they are representing and not imply that they are representing all of NVF unless explicitly authorized to do so.

The NVF Board of Directors' officers or their designee(s) must approve and sign all legally-binding agreements for the organization, including all agreements, contracts, subgrants, etc. **Unless designated as an authorized signatory, no employee should sign any legally-binding agreement.** Employees who violate this policy will be subject to disciplinary action, up to and including termination.

All employees are given an NVF email address to use when accessing NVF systems. Many projects choose to set up their own domain, but employees who use an NVF email address must include their project name in his/her signature on each email.

### **SOCIAL MEDIA**

To assist employees in making responsible decisions about his/her personal and professional use of social media, NVF has established these guidelines for appropriate use:

***Social media*** includes, but is not limited to: Twitter, Facebook, SnapChat, YouTube, LinkedIn, Instagram, Vimeo, as well as any other emerging platforms for social networking, and platforms for online discourse and information exchange, such as blogs, personal websites, or chat rooms. This policy is intended to govern use whether or not the account in question is officially associated with NVF or its projects.

***Professional Accounts Usage:*** Only authorized individuals are allowed to speak or write on behalf of NVF using social media, or to post directly to any NVF or project social media platform. Employees should consult with their project director or supervisor to receive authorization to use social media accounts to perform her/his job duties. Authorized individuals shall identify themselves honestly, operate in good faith, use their best judgement in representing the project, and comply with all NVF policies (including Code of Ethics, Conflict of Interest, and Discriminatory Harassment Prevention policies) in using accounts.

***Personal Accounts Usage:*** All NVF policies (including Code of Ethics, Conflict of Interest, and Discriminatory Harassment Prevention policies) apply to personal usage of social media. Employees' personal social media posts may affect and reflect upon NVF and its projects, whether or not the post is work-related. When using personal social media, employees must express only personal opinions and must not infer that he/she is speaking on behalf of NVF or his/her project without designated authority to do so. Do not use employer-related email addresses to register on social networks for personal use. Any personal use of social media accounts that disrupts, interferes with, conflicts with or undermines NVF project work in any

way may be addressed by a supervisor or NVF HR, and may be grounds for disciplinary action.

Inappropriate postings, whether professional or personal, that may include discriminatory remarks, harassment, and threats of violence or similarly inappropriate or unlawful conduct will not be tolerated. Maintain confidentiality at all times. See your project director if you need guidance on what is considered confidential or sensitive.

## CHILD PROTECTION

During their work, NVF employees or volunteers (together “NVF staff” or “staff”) may come into contact with children and young people under the age of 18 years (together “minors”). NVF’s top priority is to keep minors and the staff working with them safe. NVF is committed to the well-being and rights of minors. Inappropriate conduct of any kind involving a minor is unacceptable.

Protecting children from abuse and inappropriate adult behaviors is complex. The majority of staff and volunteers who work with minors seek to be a positive influence in their lives. Unfortunately, youth-serving programs can also be attractive to individuals who want access to children for inappropriate reasons, including abuse. Clear protection policies and procedures are designed to thwart these abusive individuals. However, these policies are only effective when deployed universally to staff, and when staff accept the responsibility to stop abuse when they see any policy violations or are suspicious that abuse is occurring. Compliance with protection policies and procedures supports the safety of children and youth as well as the adults and organizations that serve them.

Because child protection is complex, multiple areas must be addressed through the protection policies including:

- Preventing: The need to prevent inappropriate behavior by an adult with a minor and the need for others including staff, volunteers, parents, and minors to be vigilant regarding child protection and to report any suspected or known violation of the policies and procedures.
- Screening: Appropriate screening of staff, which requires that an individual seeking a volunteer or employee position complete an application process, background checks, reference checks, and a signed understanding and acceptance of the protection policies.
- Training: Structured training on protection policies provided to all employees and volunteers prior to the start of work. The focus of the training includes specific behavioral policies and protocols.
- Responding: Because policies and procedures aren't always successful in preventing inappropriate or abusive behaviors it is imperative that any violation of these policies be reported and that adults within the program or organization take action to protect a child at risk.

NVF developed the following policies with experts in the field. These policies are best practices and NVF Staff who encounter minors as part of their work are required to follow them. **Staff engaging with minors must also discuss and receive approval in advance of beginning their work** (See below.) We encourage Staff who have any concerns or questions about these policies to reach out to HR ([HR@newventurefund.org](mailto:HR@newventurefund.org)).

### STAFF ENGAGING WITH MINORS

NVF staff are “engaging with minors” if they will be in a setting with any minor(s) where they have the opportunity for unsupervised access. Projects that anticipate that staff will engage with minors must inform their account manager of their intent at least three months in advance of engaging with a minor to allow for background checks and training. Each staff person who will engage with minors

must:

- Understand their ability to work with minors (or their offer in the case of new employment) will be contingent on consent to and successful completion of a background check.
- Participate in interviews, which are highly encouraged to be conducted in a face-to-face setting either in-person or via video conference.
- Provide character references from previous employers; project director, supervisor or an advisory board member will conduct at least two reference checks directly with the references including queries about the applicant's work and interactions with minors. For new hires, this process may be combined with regular employment references.
- Receive training on appropriate behavior and protocols.
- Sign a waiver acknowledging his/her understanding of and agreeing to comply with these child protection policies.

Projects whose staff engage with minors shall:

- Obtain signed parent/guardian releases for the minor(s)
- Share NVF's child protection policies with parent(s) or guardian(s)

In some cases, projects may also be required to get approval for partner organization policies.

### **BACKGROUND CHECKS**

NVF Staff, including employees whether full-time, part-time or temporary, and all volunteers, including board members, who engage with minors must provide written consent to a background check. Any employee or volunteer who has not completed a background check may not under any circumstances have unsupervised contact with any minor in any NVF context. Background checks will be updated at least every five years. NVF staff are required to notify HR of any charges, arrests or convictions that occur after a background check is completed. Background checks will include, but not be limited to: criminal records search for the previous seven years for all jurisdictions lived during that time period.

If NVF decides to disqualify an individual based on the results of a background check, HR will provide the individual:

- A copy of the background check
- Written notice on the reason for the decision

### **TRAINING**

NVF Staff engaging with minors will be required to take additional training annually. This training will cover:

- How to protect minors
- How to respond to and report concerns about abuse or policy violations

### **BEHAVIOR PROTOCOLS**

Everyone who works with NVF has a responsibility to ensure that minors are protected. Staff must always:

- Treat minors in a manner that is respectful of their rights, integrity, and dignity; considers their best interests; and does not expose them to or place them at risk of harm
- Take responsibility to know and follow appropriate boundaries related to physical contact, and respect minors' right to not be touched. If touching, use appropriate forms such as high

- fives, side hugs, back pats, handshakes, etc. (See also prohibited touch below.)
- Take all reasonable actions to prevent and stop any activity that jeopardizes the safety or well-being of a minor
  - Maintain appropriate boundaries in keeping with your role as an adult, not as a friend or social peer. In particular, staff must not:
    - Use profanity or tell inappropriate jokes
    - Share intimate details of her/his personal life
    - Inquire about or discuss the minor's sexual life
  - Identify and avoid potential situations that may lead to staff behavior being misinterpreted, such as individuals spending excessive time with or having inappropriate physical contact with a minor
  - **Report any violations of this policy, regardless of whether or not any abuse occurred or is suspected. (See "Reporting Concerns or Incidents" section below.)**
  - **Take reasonable action to stop any activity prohibited by this policy from occurring with/to a minor by staff or another minor, secure the minor's safety, and then immediately report the incident to NVF's HR department (See "Reporting Concerns or Incidents" section below.)**
  - **Immediately report any concerns that a minor might be a victim of abuse or sexual exploitation to NVF's HR Director (See "Reporting Concerns or Incidents" section below.)**
  - Cooperate fully and confidentially in any investigation of concerns and/or allegations of abuse

Keeping minors safe includes restricting adult one-on-one interaction with minors. As a result, NVF staff shall:

- Engage with minor(s) with another adult physically present and engaged. For the purposes of this guidance, an adult is another member of the project staff, a partner organization employee or the minor's parent or legal guardian.
- If mentoring or counseling a minor one-on-one:
  - In advance of the meeting, notify the project director or another supervisor of the meeting date, time and location
  - AND
  - Conduct the meeting in an open area (e.g., door open, other adults nearby, clear sightlines for other adults)
    - If an open/visible area is not available, then request another project adult to periodically visit you and the minor throughout the course of the meeting.
- If there is an emergency which requires that an adult be alone with a minor (e.g., to transport the minor for medical care or to protect or remove the minor from a dangerous situation), notify another adult and a parent or guardian in advance or as soon as reasonably practicable.
- Take responsibility to know and follow appropriate boundaries related to communication and not email, text, video chat, communicate privately through social media (e.g., direct messaging on Facebook, Instagram, etc.), speak over the phone, or otherwise communicate with a minor(s) without another adult copied or conferenced into the conversation, including responding to unsolicited communications from a minor(s). Group chat platforms, where the project director or other adults have access to the group, are preferred. **Project directors must regularly monitor communication between staff and minors. Project directors communicating with minors must provide access to her/his account(s) to NVF HR upon request.**
- Only post publicly or follow minor(s) on social media from the project's account or a staff professional account; such communication must be consistent with the other aspects of this

policy. NVF staff must always use their professional email accounts when communicating with minors and never provide their personal email address. Staff who do not have a professional email account will be required to obtain one for these purposes.

NVF staff must never:

- Abuse or exploit a minor or act in any way that places a minor at risk of harm
- Act in ways intended to shame, humiliate, belittle, or degrade children, or otherwise perpetrate any form of emotional abuse
- Touch a minor in a way that a reasonable person could interpret as inappropriate. In particular, touching minors kindergarten age or older must not involve:
  - Full body or face-to-face hugs
  - Tickling, horseplay or roughhousing
  - Sitting on your lap
  - Picking up or carrying (except in an emergency)
  - Any touching of areas that would be covered by a child's bathing suit
  - Unmonitored toileting (when possible this should be completely avoided)
- Do things for children of a personal nature that they are capable of doing themselves such as helping with clothing, helping with personal hygiene/grooming, etc.
- Engage in any romantic, sexual or otherwise inappropriate relationship with a minor (even if the minor is above the local age of consent)
- Show favoritism to any minor (e.g., give gifts or unearned special privileges)
- Consume or be under the influence of alcohol or drugs (not medically necessary) in the presence of individuals under the age of 21. Refer to the Drugs and Alcohol policy of this handbook for more information.
- Encourage or be complicit in the consumption of alcohol by individuals under the age of 21
- Engage in illegal drug use in any circumstance, nor may Staff encourage or be complicit in illegal drug use by minors
- Engage in any other illegal activity under any circumstance, nor may Staff encourage or be complicit in illegal activities by minors
- Ask for or accept personal contact details from any child encountered in the course of NVF business, unless both parents and supervisors have explicitly authorized this contact
- Make personal contact with a child encountered in the course of NVF business, unless both parents and supervisors have explicitly authorized this contact for business purposes

**REPORTING CONCERNS OR INCIDENTS**

The priority of Staff must be the safety of the minor, so those reporting should use discretion in determining the way she/he handles the perceived situation, engages with those involved, and executes this reporting requirement.

**NVF Staff shall not investigate disclosed, suspected or witnessed abuse**, but shall follow these reporting requirements. Reports will be kept confidential to the extent possible, consistent with the law and the need to conduct an adequate and safe investigation.

An NVF Staff who witnesses an incident of, has concerns or suspicions about, or has a minor disclose possible abuse must:

1. Take reasonable action to stop the activity and secure the minor by removing the offending adult from interaction with the minor, if possible. If you do not feel safe doing so, seek

assistance from another adult or call law enforcement.

2. Immediately consult with NVF's HR Director, Gideon Steinberg at [gideon@newventurefund.org](mailto:gideon@newventurefund.org) or 1-646-891-2674 and, if you believe the situation falls within mandated reporting laws, then report the activity to the appropriate local authority. NVF's HR Director will support you with the reporting process.
3. If an acute situation arose and you were unable to notify the HR Director before reporting to authorities, inform the HR Director as soon as possible after your report.
4. Cooperate fully and confidentially in any investigation.

An NVF Staff who witnesses another Staff person violating any of these behavior protocols, even if they do not believe the violation rises to the level of abuse, must report that violation to NVF HR immediately. NVF HR will investigate and take appropriate action per the consequences section below.

Reports made in good faith will be viewed as evidence of the individual's concern for the best interest of the minor and NVF. Reports made in bad faith will be subject to disciplinary action, up to and including termination.

### **CONSEQUENCES**

NVF Staff (employees and volunteers) who violate NVF child protection policies will be subject to disciplinary action, up to and including termination. Incidents of a criminal nature may be reported to the appropriate authorities.

### **EQUAL EMPLOYMENT OPPORTUNITY POLICY**

NVF is committed to creating a workplace where diverse people, cultures, and perspectives are not just welcome, but where all are treated in an equitable and inclusive manner.

We believe that we strengthen the quality of our work and improve our insights by incorporating the perspectives of people who come from different backgrounds and have had different experiences. We believe in partnering with, recruiting, and mentoring individuals from various backgrounds, and we respect and honor the diversity of perspectives our employees bring to their work. We believe that it is our responsibility to create an environment in which all employees can work and thrive in an environment that is marked by respect and safety, and free from discriminatory, harmful or otherwise harassing behavior.

NVF provides equal employment opportunity to all employees and applicants without regard to race, color, religious creed, sex, gender, gender identity, sexual orientation, national origin, political affiliation, ancestry, age, disability, genetic information, veteran status, and all other classifications protected by law in the locality and/or state in which you are working. NVF does not allow, condone, or tolerate discrimination against any protected class. This EEO policy is applied to all areas of employment, including recruitment, hiring, work assignments, compensation, promotions, transfers, and opportunities for training and career advancement.

Staff should report concerns to their supervisor, the project director, and NVF Human Resources immediately. NVF takes behaviors inconsistent with these principles extremely seriously, and claims found to have merit will result in disciplinary action, up to and including termination.

### **EMPLOYMENT OFFERS**

No employment offers will be made unless the following conditions have been satisfied:

- The potential employee is 18 years of age or older
- The potential employee has completed a standard application for employment provided by NVF
- The potential employee is legally authorized to work in the U.S.
- Approval from NVF HR has been confirmed

Note that all offers must originate and receive approval from NVF HR. Unless the project's management agreement specifies otherwise, project directors and staff are generally solely responsible for all recruiting efforts. Project staff should coordinate in advance with account managers and HR to confirm budgetary considerations, project responsibilities, and timelines. All job descriptions must be approved by NVF HR before posting. NVF HR shall generate and send offer letters. Review the [hiring process](#) on the NVF Portal.

All offers will be contingent on:

- The potential employee is able to pass a background check (if applicable to the position)
- Continued availability of the project's funding for the position
- The candidate agreeing to participate in mandatory harassment training within the first three months after hire (and regular training thereafter)
- The candidate agreeing to conduct themselves in a manner consistent with the principles of ethical behavior, safety and respect.
- If necessary, the timing of NVF's completion of all legally-required state registrations (a list of current state registrations can be viewed on the [NVF Portal](#)).

#### **PROBATIONARY EMPLOYMENT**

As an at-will employer, NVF does not accommodate probationary employment (i.e., employment that is mutually considered to be impermanent until after certain criteria are met and/or a set date has expired, as defined by the terms of an offer letter). Project directors or supervisors who wish to engage in an arrangement of this nature should confer with NVF HR about the best strategy to achieve desired results. Options are generally limited to establishing a formal 90-day evaluation for the employee, or beginning the employee as a temporary employee. In order to remain compliant with applicable laws and regulations, beginning the employee as a contractor is prohibited.

#### **CATEGORIES OF EMPLOYMENT**

Every NVF employee is classified by one of the following employment categories. Your employment category determines how you are paid, how you record time, and your benefits eligibility.

- **Regular Full-Time Employee:** Works a full-time schedule of at least 30 hours per workweek (Sunday through Saturday). A regular employee is employed for an indefinite period of time. A regular employee is paid a set amount via payroll and generally is eligible for benefits for which she/he meets any other eligibility requirements.
- **Hourly Full-Time Employee:** Works a full-time schedule of at least 30 hours per workweek (Sunday through Saturday). A regular employee is employed for an indefinite period of time. A regular employee is paid a variable amount via payroll and generally is eligible for benefits for which she/he meets any other eligibility requirements.
- **Regular Part-Time Employee:** Works a consistent part-time schedule of fewer than 30 hours per workweek (Sunday through Saturday). A regular employee is employed for an indefinite period of time. A regular employee is paid a set amount via payroll and generally is eligible for benefits for which she/he meets any other eligibility requirements.
- **Hourly Part-Time Employee:** Works irregular or intermittent schedules. An hourly part-time

employee is employed for an indefinite period. An hourly part-time employee is paid a variable amount via payroll and generally is eligible for benefits for which she/he otherwise meets eligibility requirements.

- **Temporary Employee (including Interns):** Are directly hired (i.e., not through an agency) to work full-time or part-time for a specified, finite period of time. Temporary employees may be paid either a set or variable amount via payroll, and are ineligible for most benefit programs. Temporary employment exceeding 12 months will be converted to regular employee status.

Note that temporary personnel from a third-party agency are not employees of NVF. The policies, rules, definitions, and benefits described in this handbook do not apply to personnel in this category. Project directors who wish to hire temporary personnel via an agency should confer with their account managers. While hiring temporary agency personnel is permissible, project employees are not empowered to sign contracts with any third party.

Note that independent contractors or consultants are distinct from employees. Project directors who wish to contract with individuals must meet strict criteria ([explained on the NVF Portal](#)), and must seek approval from NVF Human Resources to determine compliance with labor laws.

See [Appendix A](#) for a chart of employment categories and benefits eligibility.

## **JOB CLASSIFICATIONS**

In addition to the above categories, each job is classified as “Exempt” or “Non-exempt” based on the guidelines established by the Fair Labor Standards Act (FLSA) and comparable laws in the locality and state in which you work. Job classifications are based on actual duties and responsibilities, not title, tenure, or salary. This classification solely determines the position’s eligibility for overtime pay and time reporting requirements, as mandated by federal and state law.

- **Exempt employees:** An exempt employee *is not* subject to the overtime requirements of FLSA and state laws and guidelines and receives a predetermined salary without regard to the number of hours worked. An exempt employee is paid via regular salary. Generally, these are professional, executive, administrative, or managerial employees whose job responsibilities and pay meet certain criteria established by the U.S. Department of Labor and comparable state agencies.
- **Non-exempt employees:** A non-exempt employee is subject to the overtime requirements of FLSA and state laws and guidelines, and thus receives variable pay based on the number of hours worked. A non-exempt employee must record all hours that they work each day in a manner designated by NVF. A non-exempt employee may be paid by regular salary or on an hourly basis. The non-exempt classification is made without regard to part- or full-time status, or projected length of the position. NVF HR determines an employee’s designation as non-exempt based on FLSA and state standards and consistent application of standards across NVF.

NVF HR has sole discretion to determine job classifications based on the job description produced by the project, past NVF precedent, and government standards.

## **INTERNS AND VOLUNTEERS**

NVF accommodates a variety of nontraditional and educational work arrangements to support projects’ missions, including internship programs and volunteers. The following requirements and

guidelines outline the circumstances under which each arrangement is appropriate. NVF does not permit unpaid internships but does allow volunteers under certain circumstances. Final determination of paid vs. volunteer resides solely with NVF HR.

NVF interns are temporary, non-exempt (overtime-eligible) employees. They must be paid at least minimum wage (as set by federal law or the local or state law in which the intern works) up to a maximum of \$25 per hour. They have job descriptions, are normally students or recent graduates, and may be part- or full-time. They do not receive benefits except for paid personal leave, and all compensation is taxable and paid via payroll. Under no circumstances may an intern be paid as a consultant, nor may their duration exceed one year.

With NVF HR's approval, projects may utilize volunteers who are temporary, unpaid, and generally part-time. Volunteers can only perform work that is considered "ordinary volunteerism" (e.g., stuffing envelopes, sitting at a sign-up table), and cannot displace or replace functions that paid staff would otherwise perform or be used as an alternative to hiring. Volunteers are typically scheduled on an intermittent, as-needed basis, and are often employed elsewhere. Volunteers may be reimbursed for expenses incurred in the course of performing their duties. NVF employees may not volunteer for NVF for any duties that overlap with their own job description or displace/replace other staff.

## **VERIFICATION OF ELIGIBILITY TO WORK**

NVF employs people legally entitled to work in the United States without regard to citizenship, ethnic background, or place of national origin, in accordance with the Immigration Reform and Control Act of 1986. Within three days of starting work, all newly hired employees are required to produce documents that verify identity and eligibility to work in the United States and to complete an I-9 Form at that time. If you are unable to provide appropriate documentation (or a receipt that you have applied for documentation), under the Immigration Reform and Control Act of 1986, NVF will be required to terminate employment.

## **DEPARTING EMPLOYEES**

### **VOLUNTARY DEPARTURES**

Departing employees should notify NVF HR, their supervisors, and project directors in the form of a resignation letter when they become aware that they are terminating employment. Employees are requested, but not required, to give two weeks written notice when resigning from NVF. Employees will be paid for all accrued, unused vacation leave at the time of her/his departure. Departing employees will receive instructions from NVF HR prior to their departure outlining steps for converting benefits and detailing the employee's final payroll. Exit interviews are conducted by NVF HR upon request from the project director or departing employee.

### **INVOLUNTARY DEPARTURES**

From time to time, NVF may need to terminate its relationship with an employee for reasons related to performance, illegal behavior, budgetary constraints, strategic restructuring, or other circumstances. NVF is an at-will employer and reserves the right to terminate employment at any time for any reason, with or without notice. Employees who are involuntarily terminated will generally receive written information from NVF HR explaining final paychecks, conversion of benefits, and any other logistical details pertaining to the end of their employment. Depending on the circumstances, employees may or may not be offered an exit interview. Employees who believe they have been wrongfully terminated or discriminated against should notify NVF HR immediately.

## “SPINNING”

If a project’s needs change such that it is determined that the project should become an independent 501(c)(3) organization, join another fiscal sponsor, or sunset, departing employees’ status will be treated the same as any other termination. After a project spins, the employees’ relationship with NVF as an employer terminates in every respect. The only exception to general termination proceedings is that a project may choose to transfer all vacation leave balances into the new entity in lieu of paying out accrued, unused vacation time. The option to transfer vacation will be exercised at the discretion of the project director and must be offered to all project staff consistently. The option will be applied to each employee’s entire bank of vacation leave. Project directors or employees with further questions about how this will be administered should contact their account manager.

# Employee Protections

---

## DISCRIMINATION & ANTI-HARASSMENT POLICIES

As an employee of NVF, it is your right to work in an environment in which you are treated with dignity, decency, respect. Discriminatory harassment, including sexual harassment and bullying, will not be tolerated by NVF. To that effect, NVF is committed to helping its projects develop work environments that have a culture of safety, respect, fairness, and accountability, and in which all individuals can thrive. Below, you will find important definitions related to discrimination and harassment, as well as a detailed description of the complaint procedures.

## NVF WORKPLACE BILL OF RIGHTS

Each individual has the right to work in a professional atmosphere that promotes equal opportunity and prohibits unlawful discriminatory practices and all forms of harassment and bullying. Specifically, NVF and its employees aspire together to promote a culture that:

- Promotes respect and fair treatment of employees
- Creates an environment that both is safe and feels safe
- Empowers employees to control access to their personal space
- Empowers employees to say no to behavior or language that makes them uncomfortable
- Provides a clear path on where to go and what to do when something bad happens
- Is intolerant of retaliation or reputational damage when an employee comes forward
- Provides a clear, discreet, thorough, and fair investigative process, in balance with the need for an urgent and expedient process
- Provides employees who come forward with insulation from the accused during an investigation
- Provides employees with a voice in the unfolding narrative throughout the reporting, investigative and resolution processes.
- Empowers, and does not discourage, employees from exercising their right to involve the authorities
- Is tolerant of the decisions employees make that affect them, including if they decide to remain anonymous or silent

## DEFINITIONS

NVF prohibits unlawful discrimination and harassment or workplace bullying. Federal, state, and local laws specifically protect groups or classes of people from discrimination and harassment. The specific classes of people (*hereafter, “protected class”*) includes discrimination or harassment of individuals

based on their: color, religion, national origin, sex, age, sexual orientation, gender identity or expression, personal appearance, political affiliation, marital status, family responsibilities/parenthood, veteran status, matriculation, disability, genetic information. NVF will not allow discrimination or harassment against any legally protected class in jurisdictions where NVF operates. NVF intentionally includes a protected class definition that is broader than the federal list in order to further its mission to be a more inclusive workplace environment for its employees.

This policy applies to unlawful discrimination and workplace harassment and applies regardless of the gender of the individuals involved. This policy covers all employees, including applicants for employment and third parties over whom NVF has influence (including contractors, volunteers, vendors and some partners). Violations of this policy will be subject to disciplinary measures up to and including termination.

### **1. Discrimination:**

It is a violation of NVF's policy to discriminate in the provision of employment opportunities, benefits or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment and/or salary determinations if the basis of that discriminatory treatment is, in whole or in part, on the basis of an employee's status in a protected class, as described above. This policy is intended to comply with both federal anti-discrimination laws and with other state or local laws that expand anti-discrimination protections for employees in jurisdictions where NVF operates.

### **2. Harassment and Bullying**

Harassment and bullying is defined as verbal or physical conduct designed to threaten, intimidate, denigrate or offend individuals. Both harassment and bullying are prohibited at NVF. Bullying can happen to anyone for any reason, but harassment has the added element of being based on an individual's protected class status, may include behavior that is sexual in nature (discussed in more detail below), and is considered more serious.

Please note that bullying is more severe conduct than rude or unpleasant behavior.

Harassing or bullying behavior includes but is not limited to:

- Ridicule, belittling, insults or generally makes offensive remarks
- Use of epithets, slurs, or negative stereotyping;
- Mocking, ridiculing, or mimicking another's culture, accent, appearance, or customs;
- Threatening, intimidating, or engaging in hostile or offensive acts that focus on a person's individual characteristics which may or may not be part of a protected class.

The above described unlawful harassing behavior and bullying conduct may occur on and off premises including at NVF sanctioned social events, business trips, training sessions or conferences. Conduct that an employee finds to be in violation of this policy should be reported to [gideon@newventurefund.org](mailto:gideon@newventurefund.org) or by following the complaint procedures outlined below. Taking, or threatening to take, retaliatory employment actions against an employee for reporting any incident of a harassing or bullying nature is strictly prohibited.

### **3. Sexual Harassment:**

For purposes of this policy, sexual harassment is defined as unwelcome or offensive sexual or romantic advances, requests for sexual favors, or other verbal, non-verbal, or physical conduct of a sexual nature, which makes the individual feel intimidated, humiliated, or otherwise feel threatened in their

place of work.

It is important to note anyone can be a victim of sexual harassment, regardless of their gender identity or the gender identity of the harasser. The essential factor in a sexual harassment claim is that the sexual conduct is unwanted and unwelcomed by the person against whom the conduct is directed. Adverse or rewarding employment actions in connection with associated sexual conduct may be a part of the harassing behavior, but it is not a requirement for a violation of NVF's policy to have occurred. Finally, sexual harassment, just like other forms of harassment, may occur at the work location, NVF sponsored social settings, or work-related trainings and conferences. Employees who work together may want to see each other socially; however, it is never appropriate to ask colleagues out on company time or using NVF resources.

Below are some examples of sexually harassing conduct/behavior which illustrate some types of conduct that may violate NVF's policy. However, the list below is not intended to be exhaustive and some examples are dependent on situational interpretations.

**Physical conduct:**

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, touching, and unusual or repetitive accidental contact
- Physical violence, including sexual assault

**Verbal conduct:**

- The use of employment related threats or rewards to solicit sexual or romantic favors
- Inappropriate comments on a worker's appearance, age, private life, etc.
- Sexual comments, storytelling, description of fantasies, and jokes relating to sex and/or private body parts
- Discussion about prior, present, future sexual experiences
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy.
- Insults based on the sex of the worker
- Sending sexually explicit messages/images (by phone, email, or other means)
- Gossiping, false rumors or other bullying techniques involving sex or sexual conduct
- Unwelcome and repeated flirtations, propositions, or attention

**Non-verbal conduct**

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling, staring, leering, or lingering

Finally, courteous, mutually respectful, pleasant, noncoercive interactions between employees that are appropriate in the workplace and acceptable to and welcomed by both parties are not considered to be harassment or sexual harassment.

**INCIDENT REPORTING PROCEDURE**

NVF established the following procedure for filing a report of discrimination, harassment, bullying, or retaliation. NVF will treat all aspects of the procedure confidentially to the extent reasonably possible, and informed by the desires of the person reporting.

If you are experiencing harassing behavior, NVF encourages you to first take care of yourself. This self-care can include seeking help, calling a friend, or contacting the authorities.

You are also encouraged to write down what happened, which helps support any formal steps taken if you choose to report the incident. Helpful facts to include are the name or description of the person you may wish to report (if known), details about the offensive conduct, location of the occurrence, and possible witnesses to the conduct. You may report an incident anonymously, if preferred.

#### **Who May Report an Incident?**

1. Reports can be filed by the employee themselves;
2. Witnesses;
3. Managers/supervisors who received a report of the harassing or discriminatory behavior (on the record or confidentially);
4. A proxy reporter, acting on behalf of the employee;

#### **Incident Reporting Process:**

NVF encourages the prompt reporting of incidents or concerns so that rapid and constructive action can be taken. Reports should be submitted to the HR Director at [gideon@newventurefund.org](mailto:gideon@newventurefund.org), or anonymously by mailing a letter to NVF HR, 1201 Connecticut Avenue NW, Suite 300, Washington, DC 20036.

#### **Incident Report Options**

- Employees may report an incident directly with their project director, supervisor, or NVF HR Director at [gideon@newventurefund.org](mailto:gideon@newventurefund.org) (or when the project director is the accused, any advisory board member may be contacted directly)
- Employees may forego the previous two options and report an incident to HR anonymously by sending an anonymous message to NVF HR, 1201 Connecticut Avenue NW, Suite 300, Washington, DC 20036.
- Employees located in New York may complete the sexual harassment compliant form located on [the Portal](#) if they are uncomfortable reporting verbally or in any manner listed above.

#### **Anonymous Reporting**

You have a right to anonymity and can report a claim to NVF anonymously by mailing a letter to NVF HR, 1201 Connecticut Avenue NW, Suite 300, Washington, DC 20036. Please provide as much information as you can.

All anonymous reports will be investigated to the extent possible and discussed with the harasser, the project director and advisory board. Anonymous reports may or may not be fully actionable by NVF, depending on NVF's ability to confirm critical details, uncover patterns, and fairly investigate or administer corrective action.

While NVF encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken, there is no deadline for reporting an incident. We will hear your story at any time, investigate as much as possible and appropriate, and provide you with support. That said, we encourage you to come forward as soon as you are able, as the passage of time may make it more difficult for you to recall important details or may jeopardize NVF's ability to take meaningful action. It is your right to make the decision to come forward and report an incident in your own timing. In the meantime, you are encouraged to visit the Resource Center for neutral, third-party resources to get an objective perspective on your options. These options range from health and wellness to

educating you on your legal rights and providing access to free representation.

### **Investigation Process and Outcomes**

Based in part on the type of report filed and the amount of detail included, each investigation may differ from the broad descriptions outlined below. Throughout this process, HR will keep the individual filing the complaint apprised of the situation, and ultimately the resolution.

1. Upon receiving notification of an actionable incident HR will begin an investigation with the goal of completing it in a prompt but comprehensive manner.
2. The individual filing a report may be separated from the individual being investigated during the course of the investigation.
3. HR may interview all known parties, witnesses, managers/supervisor.
4. HR will report findings to the project director (unless they are the accused), the advisory board, and the NVF President, along with recommended disciplinary action, if appropriate.
5. Separately, HR may meet with the individual filing a report and the individual being investigated to notify them of the findings of the investigation. If disciplinary action is to be taken, the individual being investigated will be informed of the nature of the discipline and how it will be executed.

Project directors or supervisors who become aware of an incident should immediately report the incident to HR. With the victim's consent, project directors or supervisors should be available to share full details, history and context with HR as HR speaks to the victim, determines if an investigation is appropriate, and investigates.

Any reported allegations will be handled in a sensitive and discreet manner. Note that NVF is obligated to notify project Advisory Boards of investigations and to aggregate the investigation report anonymously for the NVF Board of Directors.

Once an investigation is concluded, NVF HR will institute follow-up processes to reduce the likelihood of retaliation towards the victim, as well as any bystanders who may have given their support to the investigation.

### **Alternative Remedies**

Nothing in this policy prevents employees from pursuing formal legal action through local, state or federal agencies or the courts.

### **OUTCOMES**

Misconduct constituting prohibited harassment will be dealt with appropriately in the employment context. Responsive action may include reprimands, demotions or position changes, mandatory trainings or counseling, or termination. However, please note, for some accusations, that either allege criminal activity upfront or through NVFs investigation criminal activity is discovered, will be reported to the appropriate local authority for further investigation and resolution.

Retaliation against an individual, who in good faith reports prohibited harassment or provides information relevant to an allegation of prohibited harassment, is a serious violation of this policy and the retaliator will be subject to disciplinary action, up to and including termination of employment. Acts of retaliation should be reported immediately.

If an investigation results in a finding that an employee knowingly falsely accused another individual

of harassment, the accusing employee will be subject to disciplinary action, up to and including termination of employment.

### **SUPPORT**

NVF understands it can be an incredibly difficult decision to report harassment for a variety of reasons. Even when objectively offensive behavior occurs, it can still be hard to decide whether to report a colleague. You may feel uncertain whether the behavior you or a colleague are experiencing is really harassment, or you may be torn about what to do even if you are sure the behavior is harassment. Moreover, the environment of the non-profit sector can create a false sense that reporting may “sabotage” the mission.

It is for these reasons, NVF has made available the following to employees:

- An enhanced [Anti-harassment center on the Portal](#) – A library detailing the options available to you, your legal and NVF rights, and resources for self-care and support.

### **Training and Resources:**

It is mandatory that all employees of NVF receive anti-harassment training within the first three months of hire, and once a year thereafter. This training is specifically designed to contribute to:

- Empowering potential and actual victims to get help
- Creating a culture of sensitivity, transparency and accountability
- Developing proficiency in the vocabulary of harassment
- Empowering bystanders to intervene
- Putting would-be offenders on notice that this is not a safe place to victimize others

NVF’s Portal houses a [resource center](#) to equip leaders, affected employees, and bystanders to create and nurture a culture in which the likelihood for harassment is substantially reduced. Additionally, it is intended to ensure that employees are knowledgeable of their options, the procedures, the support available, and their responsibilities.

### **CONFIDENTIALITY**

Confidentiality, and discretion in connection with investigating a complaint, will be maintained as follows:

- While an investigation is pending
- When protecting the victim or witnesses
- Consistent with the wishes of the victim and instructions received from their project director or HR during and after an investigation

Confidentiality will not be used to protect a known offender.

### **BOARD REPORTING**

As a matter of policy, NVF reports all accusations of harassment to the president, the project director (when they are not the individual being accused) and the project’s advisory board. Further, all investigations of harassment are aggregated anonymously for reporting to NVF’s board of directors.

### **CONSENSUAL RELATIONSHIPS**

NVF expects that all relationships among persons in the office, including consensual relationships, will be conducted in a professional manner and will be free of bias, prejudice, or harassment. Consensual relationships between an employee with supervisory authority and any subordinate, including one not directly under the supervisor, may compromise the ability to enforce this policy against sexual harassment. Consequently, if such relationships arise, they will be considered carefully by project

directors and NVF HR, and appropriate action will be taken. Any supervisory employee involved in such a relationship is required to report the relationship to her/his supervisor and NVF HR.

Anyone who has any questions or concerns about this policy should contact the director of HR.

## **WORKPLACE VIOLENCE PREVENTION**

Violence or threats of violence in any form are unacceptable and will not be tolerated. This policy affirms NVF's commitment that all employees should be able to enjoy a work environment free from all forms of violence.

All acts or threats of violence, inappropriate aggression (e.g., throwing objects, shaking fist), harassment, or intimidation in any form (verbal, written, or physical) are prohibited.

Any pattern of behavior, incident, or threat that indicates violence toward another individual should be immediately reported to the supervisor, project director, or director of HR. If any employee or other individual is, or feels like he/she is, in immediate danger or believes another individual is in danger, they should immediately contact local law enforcement. Any report of an act of violence shall be promptly investigated and kept confidential, to the extent possible.

NVF will not permit retaliation against any individual who reports workplace violence. Any employee found to have engaged in retaliation against another individual for reporting workplace violence will be subject to disciplinary action, up to and including termination of employment.

If, however, the investigation results in a finding that an employee knowingly falsely accused another individual of violence or threats of violence or made such accusations in a malicious manner, the accusing employee will be subject to disciplinary action, up to and including termination of employment.

## **ACCOMMODATING PERSONS WITH DISABILITIES**

The Americans with Disabilities Act (ADA) requires employers to reasonably accommodate qualified individuals with disabilities. NVF seeks to comply with all federal and state laws concerning the employment of persons with disabilities.

NVF does not discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training, or other terms, conditions, and privileges of employment. A job applicant who can be reasonably accommodated for a job, without undue hardship to NVF, will be given the same consideration for that position as any other applicant.

NVF will attempt to reasonably accommodate qualified candidates and employees with a temporary or long-term disability so that they can perform the essential functions of a job. Employees who require an accommodation due to a temporary or long-term physical or mental disability should reach out to their supervisor, project director, and NVF HR to discuss the matter.

## **DEFINITIONS**

- "Disability" refers to a physical or mental impairment that substantially limits one or more of the major life activities of an individual. An individual who has such impairment, has a record of such impairment, or is regarded as having such impairment is a "disabled individual."
- A "qualified individual with a disability" means an individual with a disability who, with or

without reasonable accommodation, can perform the essential functions of the employment position that the individual holds or for which she/he has applied.

- “Reasonable accommodation” may (depending on individual circumstances) include the following: making existing facilities readily accessible to and usable by individuals with disabilities; restructuring a job; instituting part-time or modified work schedules; reassigning the individual to a vacant position; acquiring or modifying equipment or devices; adjusting or modifying training materials, or policies, and similar activities.
- “Undue hardship” means an action requiring significant difficulty or expense by the employer. The factors to be considered in determining an undue hardship include: (1) the nature and cost of the accommodation; (2) the overall financial resources of the project; (3) the number of persons employed by the project; (4) the effect on expenses and resources or other impact upon the project; and (5) the operations of the particular project. Other factors may be taken into consideration.
- “Essential job functions” refers to those activities of a job that are essential to the purpose for which the position exists and cannot be modified.

### **BREAK TIME FOR NURSING MOTHERS**

In accordance with the Fair Labor Standards Act, NVF projects will provide reasonable break time and accommodations to employees to express breast milk for nursing children. NVF projects will provide a private, shielded place other than a restroom in which an employee may express milk. NVF projects will also comply with any local or state law that may provide for reasonable accommodation for pregnant or breastfeeding employees in the locality in which such employee works. Employees who are lactating should reach out to their supervisor, project director, or NVF HR to discuss break times and the accommodations provided at their project workplace.

### **WHISTLEBLOWER POLICY**

NVF requires its directors, employees, and contractors to observe high standards of business and personal ethics when conducting their duties and responsibilities. In accordance with this whistleblower policy, it is the responsibility of all directors, employees, and contractors to report any activities or practices that may be illegal, could result in harm to NVF or its projects, or may be contrary to NVF’s policies, including violations related to:

- Accounting controls and procedures
- Child protection
- Confidential or proprietary information
- Conflicts of interest
- Equal employment opportunity
- Fraud
- Harassment
- Legal compliance

### **NO RETALIATION**

No employee or contractor who, in good faith, reports a violation shall suffer harassment, retaliation, or adverse employment consequences. An employee or contractor who retaliates against someone who has reported a violation in good faith is subject to disciplinary action, up to and including termination. This policy is intended to encourage and enable stakeholders to promptly raise serious concerns to NVF.

### **REPORTING VIOLATIONS**

All leaders and directors within NVF encourage employees or contractors to share their questions,

concerns, suggestions, or complaints. In most cases, the project director is in the best position to address an area of concern for an employee or contractor. However, if an employee or contractor is not comfortable speaking with the project director or is not satisfied with the project director's response, the employee or contractor is encouraged to speak with the director of human resources, an account manager, or anyone in a management position with whom he/she is comfortable approaching. All managers are required to report suspected violations to NVF's general counsel, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when an employee or contractor is not satisfied or is uncomfortable with following NVF's open door policy, individuals should contact NVF's general counsel directly.

For violations related to harassment or child protection, please also refer to the specific sections of this handbook related to [harassment](#) and [child protection](#) for additional guidance.

#### **GENERAL COUNSEL**

NVF's general counsel, or such other disinterested individual as is appointed by the general counsel, is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall so advise NVF's board of directors. All claims should be directed to [generalcounsel@newventurefund.org](mailto:generalcounsel@newventurefund.org).

#### **ACCOUNTING AND AUDITING MATTERS**

The board of directors shall address all reported concerns or complaints regarding NVF's accounting practices, internal controls or auditing. The general counsel shall immediately notify the president and board of directors of any such complaint and work with the appropriate parties until the matter is resolved.

#### **ACTING IN GOOD FAITH**

Anyone who files a complaint concerning a violation or suspected violation must act in good faith, having reasonable grounds for believing the information disclosed indicates a violation.

#### **CONFIDENTIALITY**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously directly to:

General Counsel  
NVF  
1201 Connecticut Avenue, NW  
Suite 300  
Washington, DC 20036

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

#### **HANDLING OF REPORTED VIOLATIONS**

The general counsel will acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

# Work Environment

---

## WORKDAY

Each project director will determine her/his project's regular business hours, but generally, a workweek will be comprised of 40 hours. Employees are entitled to at least a 30-minute lunch break within each workday, as well as other paid breaks as required by local law. If an employee wishes to work different hours than the project's standard business hours, she/he must get prior written approval from his/her supervisor.

## FLEXIBLE WORK ARRANGEMENTS

NVF hosts a variety of projects, each with unique characteristics and operational needs. Project directors may choose to utilize a variety of flexible work arrangements for their projects, weighing the nature of the project's work and resources, practicality, geography of staff, and the project's individual culture. Each project director, at his/her own discretion, may require or consider on a case-by-case basis any of the following flexible work arrangements:

- **Telecommuting:** Employees perform some or all of their work outside of a formal office
- **Flextime:** A modification in arrival and departure times while continuing to work a full-time schedule
- **Part-time schedules:** Working less than a full-time schedule. These schedules may be requested, and will be considered on a case-by-case basis. Working less than a full-time schedule impacts benefits eligibility

When requested or required, supervisors and employees can work together to determine the optimal use of flexible work arrangements, using the following guidelines:

- Employees are expected to remain effective, productive, and available to their teammates (unless otherwise agreed upon), regardless of their location.
- All flexible work arrangements are subordinate to project needs. They may be withdrawn, if deemed necessary, by a supervisor or project director.
- Employees may be expected to attend pre-scheduled all-staff meetings, regardless of location.

Project directors must report changes that affect the number of hours an employee works to NVF HR for the purposes of administering appropriate payroll changes and benefits eligibility.

## SAFETY

NVF works to ensure a safe working environment for all employees. Each project director and all employees are responsible for taking reasonable precautions to prevent accidents that could:

- Cause personal harm, injury, or illness
- Affect productivity
- Interrupt operations
- Cause damage to equipment, materials, or property

Maintaining a safe work environment requires the continuous cooperation of all employees. NVF strongly encourages employees to communicate with project directors or NVF HR regarding safety

issues.

If an employee is injured on the job, NVF provides coverage and protection in accordance with the applicable state worker's compensation laws. When an injury is sustained at work, it must be reported immediately to the employee's project director, supervisor, and NVF HR. Failure to report accidents may preclude an employee's coverage under workers' compensation insurance.

Projects with employees in the following states are required to comply with additional Workplace Injury & Accident Prevention Program, provided by HR: California, Montana, Minnesota, Nebraska, Washington, Connecticut, Oregon, Tennessee, Nevada, New Hampshire.

## **CONFIDENTIALITY**

NVF employees may gain access to confidential and/or proprietary information related to its personnel, operations, or other intellectual capital. For the purposes of this policy, "confidential information" is defined as non-public information concerning NVF's or its projects' financial data, trade secrets, strategic or other business plans, inventions and innovations, product development or other product data, current or prospective client and partner lists, client or partner financial information, marketing plans, websites, website designs, files, forms, leads, methods, software, systems, policies, techniques, procedures, the identity of any ventures or proposed ventures involving NVF and/or its projects and the substance of such ventures or proposed ventures, and any other proprietary information, except for information that is publicly available.

Such confidential information shall be kept confidential by all employees and shall not be disclosed, used, published on the internet or via social media, copied or removed from NVF or its projects' premises, except as necessary to perform normal job duties or as specifically directed. This obligation to maintain the confidentiality of NVF's confidential information applies both during and after employment. If an employee is unsure as to whether certain information is confidential information, it is the employee's responsibility to obtain a determination from his/her supervisor or project director.

All employees will be required to sign an agreement that contains a confidentiality provision in conjunction with this policy.

## **CONFLICTS OF INTEREST**

Employees should avoid any situation, paid or unpaid, that involves or may involve a conflict or perceived conflict between their personal interests and the interest of his/her NVF project. As in all other facets of their duties, employees dealing with supporters, partners, suppliers, contractors, or any person doing or seeking to do business with NVF are to act in the best interest of NVF and its projects. Each employee shall make prompt and full disclosure in writing to his or her supervisor of any potential situation that may involve a conflict of interest. Such conflicts include, but are not limited to:

- Ownership by employee or by a member of his/her family of a significant interest in any outside enterprise that does or seeks to do business with NVF
- Serving as a director, officer, partner, consultant, or in a managerial or technical capacity with an outside enterprise that does or is seeking to do business with NVF
- Acting as a broker, finder, go-between, or otherwise for the benefit of a third party in transactions involving or potentially involving NVF or its interests

- Any other arrangements or circumstances, including family or other personal relationships, that might dissuade the employee from acting in the best interest of NVF and/or its projects

NVF employees who wish to engage in political activity on a personal basis must make reasonable efforts to ensure that their involvement is disassociated with the NVF project for which they work, and actively avoid situations in which the perception of association may be construed. Certain individuals within NVF may be restricted from political activity by virtue of the position they hold or due to an established public association between the individual and NVF or the project.

If an employee is unsure whether a conflict exists, he/she should discuss the matter with either his/her project director or with HR. All conflicts and potential conflicts must be reported to HR.

### **OUTSIDE WORK (“MOONLIGHTING”)**

NVF employees being employed by or consulting for, or seeking employment or consulting opportunities with, another entity is allowed, so long as all of the following criteria are met:

- The other work does not interfere with the work the employee is doing for NVF.
- The other work schedule does not in any way overlap with the NVF employment work schedule (i.e., the employee is not being double paid for the same time).
- The employee declares the other working arrangement to the project director (or in the case of a Project Director, to the Project Advisory Board) in writing in advance of engaging in that work.
- The work meets all of the criteria of the conflict of interest policy, and the work is not otherwise antithetical to the mission or goals of the project or of NVF.

Note that individuals seeking to do work for another project within the managed organization for which they already work must review the situation with HR in advance.

### **INFORMATION TECHNOLOGY SYSTEMS POLICY**

The purpose of this policy is to define appropriate use of computers, internet services, networks, email systems, and voicemail that are paid for and maintained by NVF projects. The following activities are in violation of this policy:

- Any illegal activities, or activities in support of illegal activities
- Use of NVF resources for any political activity in support or opposition to a candidate (See Portal [guide to election year activities](#) for more guidance.)
- Use of NVF resources for for-profit activities not related to NVF business
- Transmitting defamatory, threatening, obscene, or harassing materials, or messages that disclose personal and/or confidential information without authorization
- Interfering with or disrupting network users, services, or equipment. Disruptions include, but are not limited to, distribution of unsolicited advertising, propagation of computer worms and viruses, and using the network to make unauthorized entry to any other machine accessible via the network
- Unauthorized copying of material or media protected by copyright
- Propagation of fraud or spam
- Downloading of defamatory, obscene, or offensive materials

The above list is not exhaustive, and NVF retains sole discretion in determining possible abuse. If at

any time, the policies contained in this handbook conflict with the policies created for specific resources (such as Concur, fundraising software, etc.), the more restrictive policies will apply. Employees should refer to the Portal for other resource policies.

### **EMAIL PRIVACY**

All messages composed, sent, received, or stored on NVF-supported email systems are the property of NVF. They are not the private property of the employee, and therefore, the confidentiality of any message should not be assumed. NVF and its project directors reserve the right to review, audit, intercept, access, disclose, and use messages created, received, or sent through its email systems. The contents of email may be disclosed and used by NVF to protect its rights and/or property without the permission of the employee, at NVF's discretion.

Employees who are not project directors or who are involved in the maintenance or operation of the project's email systems are not authorized to retrieve or read any email not sent to them.

As with email, voicemail systems are available to assist in NVF business and voicemails are NVF's property.

### **TECHNOLOGY AND NETWORK SECURITY**

The security of NVF's projects' technology and networks depends upon each user behaving responsibly while accessing the networks. NVF staff are advised to guard passwords; regularly update operating systems, anti-virus software, and anti-malware software; and avoid potentially dangerous online content presented in browsers, email applications, and other media platforms. If an employee is uncertain about safeguarding their technological resources, it is the responsibility of projects and individual employees to seek advice from qualified experts.

### **TECHNOLOGY CARE**

Employees entrusted with technology purchased by NVF are expected to exercise reasonable care in using the technology. Employees are expected to be careful with the equipment, adequately safeguard it against theft and misuse from non-NVF employees, transport it in protective carrying cases, not leave it unattended in public places, and otherwise exercise care and judgment that would be generally considered reasonable with respect to expensive equipment. Employees who lose or damage NVF equipment for reasons of gross irresponsibility or negligence may be liable for the replacement cost.

Employees can view [NVF's Equipment Policy](#) for more details about NVF-owned technology equipment.

### **DRUGS AND ALCOHOL**

It is the policy of NVF to create a workplace free from the effects of drug and alcohol abuse. This policy is in keeping with the intent of the Drug-Free Workplace Act. It is expected that all employees report to work in a condition to perform their duties.

Violations include, but are not limited to, possessing illegal substances or narcotics, at work; being under the influence of or using those substances or alcohol while working; illegally manufacturing or selling illegal substances or narcotics using NVF resources; behaving in a manner in violation of the harassment policy while under the influence of those substances, or inappropriately dispensing or distributing illegal substances, narcotics, or alcoholic beverages at work or work events.

Employees who believe someone conducting NVF business is under the influence of drugs, narcotics, or alcohol should immediately discuss the matter with their supervisor, project director, or NVF HR. Employees found to be under the influence will be required to stop working for the day and leave the premises. Upon return to work, employees will be required to discuss the matter with their supervisor or project director, and NVF HR.

Employees who return to work and whose performance remains impaired due to use of drugs and alcohol may be required to submit to testing at a certified laboratory and may be subject to disciplinary action, up to and including termination.

#### **ALCOHOL CONSUMPTION AT EVENTS**

From time to time, NVF projects may hold events that provide alcoholic beverages. Employees are expected to behave responsibly at such events, including acting in accordance with NVF's harassment policies and not drinking and driving. Further, it is illegal for employees to provide alcohol to people under the legal drinking age in any circumstance. Violations of this policy, NVF's harassment policy, or failure to comply with the law may result in disciplinary action up to and including termination.

#### **INTERNATIONAL TRAVEL**

Employees engaged in international travel on official NVF business must report their travel to [HR@newventurefund.org](mailto:HR@newventurefund.org) in advance of the travel. NVF employees otherwise eligible for benefits will continue to receive benefits while traveling and will be covered by NVF's general travel insurance policies according to the terms of those policies. Projects may wish to buy additional coverage at their own expense should NVF's policies be insufficient for their needs. Employees can read more about NVF's policies and benefits for international travel by reviewing the [International Travel and Medical Insurance Information](#) resources on the Portal.

## **Payroll and Benefits**

---

#### **PAYROLL**

NVF operates two pay periods per month. Employees receive their paychecks on the 15th and last day of each month. NVF employees are generally paid via direct deposit (unless requested otherwise), and an employee's first deposit will be made subsequent to the receipt of required payroll paperwork. If the 15th or last day of the month fall on a weekend or holiday, the employees will receive pay on the preceding workday. All payroll paperwork sent to NVF HR by the 5th of a month will be processed for the payroll deposits occurring on the 15th, and all paperwork received by the 20th will be processed for deposits occurring on the last day of the month. Current employees interested in making changes affecting payroll, such as changing tax withholdings, updating address, or altering voluntary benefit deductions, should contact [HR@newventurefund.org](mailto:HR@newventurefund.org) for further instructions.

#### **TIMEKEEPING**

In order to maintain NVF's tax-exempt status, all employees, regardless of status or position, are required to accurately record their hours worked in a timely manner through NVF's cloud-based timekeeping system. Timesheets must account for all hours worked in a pay period and must be submitted through the timekeeping system by the 1<sup>st</sup> and 16<sup>th</sup> of each month. By the 5<sup>th</sup> of each month, supervisors must approve timesheets submitted for the month prior.

NVF also uses the timekeeping system to centralize and automate time-off requests. Employees will

receive instructions and login credentials for the system upon the start of their employment with NVF.

### **OVERTIME**

By law, NVF is required to pay overtime to non-exempt employees according to the applicable federal, state, and local government regulations. Employees are required to report overtime via the timekeeping system through regular time entry. By entering the hours worked, employees will automatically be paid for overtime on the subsequent payroll. NVF is required to pay overtime when it has been worked, without exception. Non-exempt employees must be cognizant of their time and seek pre-authorization from a supervisor for overtime in advance of working it. However, overtime must be reported and paid regardless of pre-authorization. Repeated reports of overtime without pre-authorization will be grounds for disciplinary action.

Note that regulations on how overtime is calculated and paid differ across states and localities. Non-exempt employees and their supervisors should seek guidance from NVF HR in order to understand the applicable rules for their situation.

### **LOBBYING AND POLITICAL ACTIVITY**

While individual project directors might require different levels of detail in timesheets from employees, for compliance purposes all employees must carefully track time spent on lobbying. Additionally, employees of projects that have a 501(c)(4) component must carefully track time spent on political activities and other activities for the 501(c)(4).

NVF is required to track and file lobbying activities in accordance with IRS and congressional regulations in order to maintain its tax-exempt status. Additionally, for projects with a 501(c)(4) component, NVF uses timesheet data related to time spent on political activity and other activities related to the 501(c)(4) to allocate staff costs between the projects.

Employees who engage in lobbying and/or political activity who fail to submit timesheets via NVF's timekeeping system will be subject to disciplinary action.

Employees who need more detailed information can refer to the Portal or reach out to account managers.

### **WAGE GARNISHMENTS**

NVF complies with any and all court orders, the Consumer Credit Protection Act (CCPA), and any other applicable laws. Upon receiving a court order to garnish wages, NVF will notify the employee immediately and begin withholding wages on the subsequent payroll. NVF will provide all information available to the employee on how she/he can protest the garnishment in court.

### **EMPLOYEE BENEFITS**

NVF provides a robust benefits package that is reviewed with all employees during their HR orientation. This section provides only a high-level overview of the current benefits. Employees who would like to learn more about NVF's benefits should contact NVF HR or [review the resources](#) on the Portal.

Benefits run and reset on the following schedule:

<b>Benefit Type</b>	<b>Schedule</b>
All insurance plans	May – April
HRA	May – April
FSA*	Jan – December
Paid time off	Calendar year
401(k)	Calendar year
Transportation	Calendar year

NVF reserves the right to modify, change, or eliminate any of its benefits at any time. The terms of the specific plan documents (located on the Portal) control eligibility, claims determinations, and other limitations and conditions.

NVF provides variable benefits depending on employment category and average hours worked. For a complete list of benefits eligibility, see [Appendix A](#).

At this time, NVF provides the following benefits for eligible employees:

- Medical, dental, and vision insurance
- Access to NVF-funded health reimbursement account (HRA) to help offset co-pay, deductible, and vision/dental expenses
- 401(k) retirement plan, with up to 3% match
- Short-term and long-term disability insurance
- Base-term life and accidental death and dismemberment (ADD) insurance, with an employee buy-up option
- Flexible spending account for medical and dependent care
- Pre-tax transportation
- Smartphone benefits (variable eligibility; stated in offer letter if eligible)
- Fitness benefits (variable eligibility; stated in offer letter if eligible)

NVF extends health insurance coverage to all eligible dependents and domestic partners.

#### **OPEN ENROLLMENT AND QUALIFYING LIFE EVENTS**

Employees are typically locked into certain benefits selections for the entire plan year by the provisions of the particular benefit policy, except during open enrollment, or unless they experience a “qualifying life event” as defined by the Department of Labor (For more information, see <http://www.dol.gov/ebsa/pdf/CAGHIPAA.pdf>). The medical, dental, and vision insurance, as well as the flexible spending accounts, are the only benefits affected by this limitation. All other benefits can be altered throughout the year. NVF provides an open enrollment season annually, usually occurring in April. During this time, NVF will also communicate changes (if any) to benefit plans that affect employees.

#### **COBRA CONTINUATION**

Pursuant to the Consolidated Omnibus Budget Reconciliation Act of 1986 (COBRA), almost all terminated employees are eligible for continuation of their health insurance coverage at their own cost for a period of up to 18 months following their termination. Terminated employees will receive a more detailed explanation of their rights under COBRA after their termination. Participants (and/or their covered dependents) may be eligible to be covered for a period of up to 36 months, within the

COBRA guidelines. If a former employee chooses to continue medical, dental, and/or vision coverage, he/she must pay the total premium and any applicable administrative fee. Coverage will cease if the former employee fails to make payments as scheduled, becomes covered by another group plan that makes the former employee no longer eligible for COBRA, or he/ she becomes eligible for Medicare.

### **WORKERS' COMPENSATION INSURANCE**

All employees are fully covered by workers' compensation insurance, as required by law. In accordance with the laws of the state in which the employee works, this insurance provides benefits for injuries or illness arising in the course of executing duties associated with employment with NVF.

Any such injury or illness should be reported immediately to an employee's project director and NVF HR. Failure to do so may jeopardize any claim for benefits. At the time of report, NVF will provide employees with all information regarding workers' compensation insurance claims and benefits procedures.

### **DISCRETIONARY BENEFITS**

Certain benefits can be provided at a project director's discretion, in consultation with his/her advisory board. Project directors will weigh budgetary, cultural, and general feasibility considerations in deciding whether and to whom these benefits will be offered. They may be offered based on seniority, project-wide policy, or as a term of individual negotiation. Circumstances for providing these benefits vary and will be at the sole discretion of each project director. Employees should review their offer letters to determine their level of discretionary benefits, if any. Project directors who wish to offer other benefits not mentioned in this section should discuss with NVF HR.

### **MOBILE PHONE EXPENSES**

NVF may provide employees with a monthly mobile phone reimbursement benefit. This benefit is generally capped at up to \$75 per month for expenses associated with the costs of maintaining a monthly smartphone. Qualified mobile expenses include: monthly voice and data expenses, costs associated with mobile hotspots, or ongoing mobile internet expenses. Note that internet expenses associated with travel, such as Wi-Fi at hotels, airports, coffee shops, or any other ad hoc public internet are reimbursed separately as a travel expense. Employees must present documentation via NVF's expense reimbursement system in order to receive this benefit. Mobile expenses may not be submitted more than 60 days after they were incurred, and are only available for expenses incurred after the effective date of the benefit offering.

Separately, NVF may also reimburse employees up to \$200 every two years for the purchase of a new mobile phone. This does not apply to the purchase of computers, tablets, or any other internet-connected device. If a phone is leased or purchased on an installment plan through some third-party carrier, employees may receive monthly reimbursements for the monthly incurred costs. Employees must present documentation via NVF's expense reimbursement system in order to receive this benefit. Expenses may not be submitted more than 60 days after they were incurred and are only available for expenses incurred after the effective date of the benefit offering.

### **FITNESS BENEFIT**

To encourage employees to maintain a healthy work-life balance, NVF may provide employees with a monthly fitness benefit. This benefit is generally capped at up to \$75 per month for reimbursements associated with fitness costs. Reimbursable expenses include health club fees, fitness-related memberships, fitness trainers, fitness classes, running shoes, bike tune-ups, race registrations, gym or sports equipment, and other fitness-related activities and items as approved by NVF HR. Recreational

activities, weight-loss programs, smoking-cessation programs, and other similar programs, although encouraged for your overall well-being, do not qualify for reimbursement.

Additionally, fitness equipment can be purchased under the terms of this policy as follows:

- Equipment is defined as one major purchase for a home gym, or gym/sports equipment.
- The purchase of home gym equipment can be made only once during an employee's tenure.
- Reimbursements for equipment can be applied up to the maximum of \$75 per month for six consecutive months (total value of \$450).
- The purchase of equipment replaces any other fitness reimbursements that might have been allowable during that same time period (i.e., no double-dipping).
- Reimbursements will only be made in one-month increments, provided that monthly expense reports are submitted with appropriate receipts.
- The same receipt from the original purchase may be used for each month's expense report.
- The first reimbursement request must be submitted within 60 days of the expense being incurred, and each additional request must be submitted within the consecutive five months.

Employees must present documentation via NVF's expense reimbursement system in order to receive this benefit. Fitness expenses may not be submitted more than 60 days after they were incurred (with the exception of the purchase of fitness equipment, as noted above), and are only available for expenses incurred after the effective date of the benefit offering.

#### **GIFTS FOR EMPLOYEES**

Supervisors are encouraged to recognize important life events of their employees. Non-cash gifts, such as flowers, or donations to a charity in lieu of same, may be presented as an expression of congratulations in the event of a birth, an adoption, or a marriage of an employee, or as an expression of sympathy in a death or major illness of an employee or a member of the employee's family (child, parent or immediate household member).

When using NVF or project charitable funds, the maximum cost for any non-cash gift to an employee is \$100. Due to taxable restrictions, actual cash awards, gift cards, or other cash equivalents are prohibited when using NVF or project funds. This policy does not preclude employees from collecting personal funds amongst themselves to provide cash or non-cash gifts to a fellow employee. If project funds are not available, NVF has some unrestricted funds available for this purpose. Please contact HR for guidance.

#### **PAID TIME OFF (PTO)**

NVF provides regular employees with time off throughout the year, as described in the terms of this handbook and each employee's offer letter. NVF encourages employees to avail themselves of paid time off to pursue outside interests, prevent burn-out, and nurture a happy and healthy balanced lifestyle. The policies surrounding time off are a combination of NVF's values, best practices, and regulatory requirements. All time off can be taken in a minimum of one-hour increments. All planned time off should be approved by a supervisor in advance, when possible.

State laws vary regarding how paid time off can be treated in terms of accrual, roll-over from one year to the next, and annual maximums. Unless state law dictates otherwise, most employees will be allowed to carry over a maximum of 40 hours of personal leave and 40 hours of vacation leave each calendar year. Employees should refer to their offer letters to see the rates at which their personal leave and vacation leave accumulate and the level at which they are capped.

## **VACATION LEAVE**

All regular employees receive vacation leave to use for any purpose they deem fit. Vacation leave accrues with each pay period, and use must be approved in advance by a supervisor. Employees may borrow a full year's allotment of vacation time with the written approval of the project director.

If a project is "spinning" out of NVF (i.e., moving to a different fiscal sponsor or has obtained its own tax status), the project director, in conjunction with the new entity, may opt to transfer employees' full leave balances to the new entity in lieu of paying out vacation. If a project director selects this option, the transfer must be administered the same for all employees, and for all vacation leave. Hybrid options, such as partial leave being paid and partial leave being transferred, are not permissible.

If an employee has borrowed any portion of vacation leave that he/she has yet to accumulate and his/her employment with NVF ends, NVF will seek repayment for the balance of the unearned borrowed leave.

## **PERSONAL LEAVE**

All employees, regardless of employment status or tenure, receive personal leave to be used for the following purposes:

- To attend to personal needs of any kind
- To address personal or dependent health issues, including sick or wellness appointments
- To care for an employee or an immediate family member who was the victim of domestic violence, stalking, or sexual assault
- To attend or participate in school-related events for a child to whom the employee is closely tied

Employees must notify supervisors of plans to use personal leave as soon as is practical to do so. When personal leave is used for illness, the employee may be required to provide a doctor's note. Frequent and consecutive use of unplanned personal leave for reasons other than bona fide health issues may be grounds for disciplinary action.

Full-time regular employees generally accumulate personal leave at a rate of 3.33 hours per pay period. Part-time or temporary employees should refer to their offer letters to see their accrual rate.

If an employee has borrowed any portion of personal leave that he/she has yet to accumulate and his/her employment with NVF ends, NVF will seek repayment for the balance of the unearned borrowed leave. Unused personal leave is not paid out upon termination.

## **DONATING TIME**

From time to time, an extreme circumstance may arise in which an employee would seek to donate her/his time to another employee to augment her/his paid time off. With written approval from NVF HR and the project director, an employee may, at her/his sole discretion, choose to donate a portion of her/his personal leave to another employee within the same project. The amount of leave one employee may donate will not exceed 40 hours in one calendar year. Employees who wish to donate their leave will do so free of coercion, and without any expectation of reward or repayment. Donated leave expires one year from the time of donation. Leave that has been donated may not be reclaimed and is otherwise subject to all the normal criteria of the personal leave policy. Employees who wish to donate time to another NVF employee should contact [HR@newventurefund.org](mailto:HR@newventurefund.org).

## **VOLUNTEER LEAVE**

Volunteer leave is available to most full-time employees to volunteer their time in the service of their community or a social cause. Volunteerism lies at the foundation of NVF's values and we encourage each employee to take advantage of this opportunity to give back. Volunteer leave can be used in one-hour blocks, one day at a time, or all in one week. Volunteer leave hours are intended for use during normal business hours. Time spent in a volunteer capacity outside of the normal workday should not be submitted as volunteer leave.

Employees receiving volunteer leave are generally provided with 20 hours of paid leave per year for volunteer work on their first day of work. Volunteer leave must meet the following requirements:

- The employee is not receiving payment or other benefit as compensation for his or her time.
- The volunteer leave is not spent in a way that provides financial profit for any individuals.
- The volunteer activity has been vetted for conflict of interest concerns by the project director.
- The volunteer leave is not spent on any political activity, including supporting any candidate or political party. Volunteer leave may be used to work on non-partisan activities, such as volunteering with your local election commission.

Volunteer leave may not be substituted for other types of leave and is not paid out upon termination.

## **VOTING LEAVE**

In circumstances where an employee's work schedule does not provide sufficient time to vote on an election day, NVF will provide a reasonable amount of time off during scheduled work time, including up to two hours of paid time off, for employees to vote. Employees who need time off to vote should notify their supervisor or HR at least two days prior to election day and submit proof of voting.

## **HOLIDAYS**

All regular employees are eligible for paid holidays each year. NVF's holiday schedule consists of seven standard holidays and four floating holidays chosen by each employee, for a total of 11 paid holidays each calendar year. If a holiday falls on a Saturday, it will be observed on the preceding Friday; if a holiday falls on a Sunday it will be observed on the following Monday. NVF projects will be closed for the following standard holidays each year:

1. New Year's Day
2. Martin Luther King, Jr. Day
3. Memorial Day
4. Independence Day
5. Labor Day
6. Thanksgiving Day
7. Christmas Day

Each employee receives four floating holidays per year, which are submitted for approval as time off requests through NVF's timekeeping software. Floating holidays must be scheduled and taken within the same calendar year they are received. Floating holidays will not carry over into the following year. Supervisors may reject requests for specific floating holidays, but must approve requests for the full allotted amount over the course of the year. Note that employees starting in the middle of the year will receive floating holidays as follows:

- Start date prior to July 1 – eligible for all four floating holidays
- Start date after July 1 – eligible for two floating holidays

Floating holidays may not be treated as vacation and taken at any time; rather, floating holidays should be scheduled on a specific date in conjunction with a recognized holiday. NVF has assembled the following non-exhaustive list of floating holidays, but employees may submit requests for other holidays not listed for approval. Floating holidays include, but are not limited to:

Presidents' Day	Diwali
Ash Wednesday	Dia de los Muertos
Passover	Veterans' Day
Good Friday	Day before Thanksgiving
Easter Monday	Day after Thanksgiving
Eid al-Fitr	Christmas Eve
Eid al-Adha	Day after Christmas through New Year's Eve
Rosh Hashanah	Kwanzaa
Yom Kippur	Chinese Lunar New Year
Indigenous Peoples' Day	Individual Birthday

Employees must submit floating holiday requests to their supervisors with enough notice to coordinate schedules and appropriate coverage, but must submit requests a minimum of two weeks in advance of the holiday. Supervisors may reject last-minute requests or in cases when they are unable to coordinate appropriate coverage. Employees who wish to swap a previously approved floating holiday for a new one may do so with supervisor approval.

Project directors may, at their sole discretion, choose to select project-wide floating holidays to synchronize employees' floating holiday schedules within a project to coordinate office closures. Similarly, project directors may assign floating holidays to their employees who do not select the dates on their own.

Project directors may, at their sole discretion, choose to close their project's offices during the week between Christmas and New Year's Day, providing paid leave for eligible employees. Project directors who wish to do so should notify HR and their account manager.

### **COMP TIME**

Project directors may, at their sole discretion, award comp time on a case-by-case basis to exempt employees as recognition of working above and beyond, to substitute for working on a day when the office was closed and the employee was not scheduled to work, or in recognition of extended travel time. Non-exempt employees may be given a comp day to substitute for working on a day when the office was closed and the employee was not scheduled to work, or in recognition of unpaid travel time, depending on state law. Comp time may never be used in lieu of regular or overtime payments to non-exempt employees and non-exempt employees must always log and be paid for all time worked.

Comp time must be awarded in increments of 4 or 8 hours and must be communicated to HR. The awarded time will be added to the employee's Comp Time balance in Replicon. All awarded comp time must be tracked and logged in Replicon and must be used within the calendar year it is awarded. Supervisors and employees are encouraged to ensure comp time is taken shortly after it is awarded.

Comp time is not paid out upon termination of employment.

#### **LEAVE WITHOUT PAY**

An employee may, whether for personal or project-related reasons, request an extended period of time away from work without pay. Each proposed instance of leave without pay will be evaluated on a case-by-case basis and must be pre-approved in writing by both NVF HR and the project director. Further, leave without pay must be temporary, and taken in increments of no fewer than eight hours at a time. Leave without pay may be provided with or without paid benefits. Employees may not perform any work-related duties while on leave without pay.

#### **JURY DUTY**

If an employee is summoned to jury duty, NVF allows the employee to take time off without loss of salary or benefits or having to use paid time off for up to 10 days. Employees shall notify project directors and NVF HR immediately upon receiving the summons so that arrangements can be made for her/his absence. The employee must send a copy of the summons to NVF HR. In cases in which an employee is required to serve on a jury for longer than 10 days, the employee may use vacation or personal leave or leave without pay. Employees must provide NVF HR with official documentation confirming their service.

#### **BEREAVEMENT LEAVE**

In times of extreme personal distress, such as, but not limited to, the death of someone with whom the employee was close, the employee may take up to three days of bereavement leave per incident. All wages and benefits will continue without interruption during such periods of leave. Leave must be approved in writing by NVF HR, with the employee providing as much advance notice as is possible under the circumstances.

#### **INCLEMENT WEATHER**

In the event of extreme weather conditions, project directors may elect to close their offices. Each project director will determine his/her own internal communication policies for notifying staff. In the event an office remains open but an employee determines that commuting to work will be hazardous, the employee may coordinate with her/his supervisor as to whether personal leave or working from home is appropriate. If the office is closed, employees will not be required to use leave time.

#### **MILITARY RESERVE SERVICE**

NVF recognizes and respects the right of each employee to perform public service through military reserve duty. NVF will allow employees to schedule vacation or personal leave or leave without pay for time spent serving in the reserves. Employees must coordinate their reserve duty time in advance with their project director. All benefits will continue except where specific exceptions are taken in the medical, dental, prescription drug, vision, short- and long-term disability, workers' compensation, and life insurance policies for military training, and in cases where the employee has taken leave without pay. The requirements and obligations under federal and state law will be provided in more detail to employees at the time they request military leave.

#### **DISABILITY & PARENTAL LEAVE**

Disability or parental leave is paid leave associated with an employee's own disability, the birth of an employee's own child, or the placement of a child with the employee in connection with adoption or foster care. Employees can use disability or parental leave instead of vacation or personal leave. All time off must be coordinated with the project director and reconciled to the needs of the project, when possible.

**Disability Leave:** The Disability Leave policy affords all full-time NVF employees who have been on staff for one year or more with up to six weeks of fully paid disability leave per year. Payment for this leave may come from a combination of paid leave via paid time off entry and disability insurance, when applicable. Employees will receive up to their regular full salary for the period of time approved by either the state or NVF-sponsored disability insurance (whichever is longer), for up to six weeks. Part-time employees or employees who have been on staff for less than one year may still be eligible for partially paid leave through NVF's disability insurance program. Disabilities not approved by either state or NVF-sponsored disability insurance will not be covered under this policy.

**Parental Leave:** The Parental Leave policy affords all full-time NVF employees who have been on staff for one year or more up to 12 weeks of fully paid leave in all cases related to birth, adoption, or foster care, provided they meet all other criteria associated with this policy. Payment for this leave may come from a combination of paid leave via paid time off entry and disability insurance, when applicable. Part-time employees or employees who have been on staff for less than one year may still be eligible for up to six weeks of partially paid leave through NVF's disability insurance program.

Parental leave expires after one year from the birth or placement of the child. If the employee works in an office where the local and/or state law provides for greater benefits for parental leave than are provided herein, then an eligible employee will be entitled to receive those greater benefits.

Employees must provide 30 days' notice (or as much notice as is practicable if the leave is not foreseeable) to their project director and NVF HR. Employees must notify the project director and NVF HR as soon as possible of the exact start date of the leave. Disability or parental leave may not be used prior to the disability or the actual birth or placement of a child.

Once parental or disability leave has been exhausted, employees may continue to use personal and vacation leave, but may only use the leave they have accumulated to date. Employees may also go on unpaid leave. See the Family and Medical Leave section below for more details.

Employees ineligible for disability or parental leave under this policy may use vacation and personal leave accrued at the time of the disability or the birth or placement of the child. At the project director's approval, an employee may borrow a full year's allotment of vacation and/or personal time from their unaccrued leave in order to receive up to their normal salary amount during the leave. Before approving, project directors will weigh the programmatic and financial impact of authorizing the employee to borrow unearned leave, so approval is not guaranteed. Employees should further note that while borrowing ahead into unearned leave is permissible, employees are liable to pay for all leave taken but not accrued if employment terminates for any reason prior to accruing the leave.

#### **FAMILY AND MEDICAL LEAVE (FML)**

NVF will grant an unpaid leave of absence for care of a child after birth or adoption, the care of a covered family member with a serious health condition, or in the event of an employee's own serious health condition. Family members include all relatives by blood, legal custody, or marriage, and people with whom the employee lives and has a committed relationship.

FML leave is unpaid leave that focuses on temporary security of an employee's job and benefits while they are absent for the reasons listed above. FML leave does not guarantee pay, except

insofar as paid parental/disability, personal or vacation leave is utilized. Note that FML leave runs concurrently with all instances of paid parental/disability leave, and certain instances of extended sick leave.

In order to be eligible for this policy, an employee must satisfy all of the following:

- Have been on staff with NVF for at least 12 months or 52 weeks (this time need not be consecutive, so long as time between employment does not exceed seven years)
- Have worked a minimum of 1,250 hours during the previous 12 months
- Be a regular full-time or regular part-time employee

Under this policy, employees will be eligible for up to and not more than 16 weeks of unpaid family and medical leave per year (or up to 26 weeks of military caregiver leave to care for a covered service member with a serious injury or illness). Upon return, the employee is guaranteed either the same position he/she had before leaving, or a position that has equivalent pay, benefits, working conditions, and seniority. NVF may choose, at its sole discretion, to exempt certain key employees from this requirement and not return them to the same or similar position. Longer periods of leave may be granted upon written approval by the project director and NVF HR.

Pursuant to the federal Family & Medical Leave Act, a family/medical leave of absence is not available unless the NVF employee works in a worksite that employs 50 or more NVF employees working within 75 miles. If that criterion not met, NVF's policy providing for FML will apply. If the NVF employee works in a location where he/she is eligible to receive greater benefits under local and/or state law, then those greater benefit provisions shall be applicable.

All conditions or situations giving rise to the use of FML leave must be documented and sent to NVF HR.

All employees requesting FML leave must provide verbal or written notice of the need for the leave to NVF HR, with at least 30 days' notice, when practicable. If eligible for FMLA leave, NVF HR will provide the employee with the US Department of Labor (DOL) Notice of Eligibility and Rights within five business days after the employee has provided this notice. Within five business days after the employee has submitted the appropriate certification form, NVF HR will complete and provide the employee with a written response to the employee's request for FML leave using the DOL Designation Notice. NVF will require employees on FML leave to report periodically on his/her status and intent to return to work.

While an employee is on leave, NVF will continue the employee's health benefits during the leave period at the same level and under the same conditions as if the employee had continued to work.

If the employee chooses not to return to work for reasons other than a continued serious health condition of the employee or the employee's family member or a circumstance beyond the employee's control, NVF will require the employee to reimburse the amount it paid for the employee's health insurance premium during the leave period within 30 days.

If the employee has purchased a voluntary life insurance plan, NVF will continue making payroll deductions while the employee is on paid leave. If the employee is on unpaid leave, the employee may request continuation of such benefits and pay his/her portion of the premiums. If the employee does not continue these payments, the employer may discontinue coverage during the leave.

Any leave used for the birth or placement of a child will be designated as FML leave, will count toward the employee's 16-week unpaid entitlement, and must be used within one year of the birth or placement.

The employee may take FML leave in 16 consecutive weeks, may use the leave intermittently (e.g., take a day periodically when needed over the year) or, under certain circumstances, may use the leave to reduce the workweek or workday, resulting in a reduced hour schedule. In all cases, the leave may not exceed a total of 16 workweeks (or 26 workweeks to care for an injured or ill service member) over a 12-month period. Time not worked needs to be accounted for by using either paid or unpaid leave.

For the birth or placement of a child, NVF and the employee must mutually agree to any alternate or intermittent schedules in writing. If the employee is taking leave for a serious health condition or to care for a family member, the employee should try to reach agreement with NVF before taking intermittent leave or working a reduced hour schedule. If the employee is unable to receive approval for the new schedule, the employee must provide documentation from a medical provider that the use of the leave is medically necessary.

NVF may temporarily transfer an employee to an available alternative position with equivalent pay and benefits if the alternative position better accommodates the intermittent or reduced schedule.

NVF may require documentation from a health provider for an employee's serious health condition or to care for a family member. The employee must respond with the required documentation within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide documentation may result in a denial of continuation of leave. An employee wishing to return to work after use of FML leave may be asked to provide documentation from a health provider clearing the employee to return to work.

NVF HR may directly contact the employee's health care provider for verification or clarification purposes. Before NVF makes this direct contact with the health care provider, NVF will provide employees with the opportunity to resolve any deficiencies in the medical certification. NVF has the right to ask for a second opinion at NVF's cost if it has reason to doubt the certification. NVF may deny FML leave to an employee who refuses to release relevant medical records to the health care provider designated to provide a second opinion. If necessary to resolve a conflict between the original certification and the second opinion, NVF may require the opinion of a third health care provider at NVF's expense, selected by mutual agreement. The third opinion will be considered final. The employee will be provisionally entitled to leave and benefits under the FML policy pending the second and/or third opinion.

NVF may request recertification for the serious health condition of the employee or the employee's family member no more frequently than every 30 days unless circumstances have changed significantly, or if the employee seeks an extension of his/her leave. NVF may provide the employee's health care provider with the employee's attendance records and ask whether the demonstrated amount of leave is consistent with the employee's (or the employee's family member's) serious health condition.

# Performance Management

---

## EMPLOYEE EVALUATIONS

NVF employees shall receive performance evaluations annually, provided they meet all of the following criteria:

- Is a payroll employee, regardless of part- or full-time status
- Has been employed at least six months
- Is not an intern, volunteer, or temporary employee

Note that consultants may not receive performance evaluations.

NVF highly encourages an informal evaluation after the first 90 days of employment, and on a regular basis outside of the annual evaluation process.

Annual evaluations are mandatory for all regular employees, including project directors. Employees with questions about how this requirement applies to them should consult NVF HR.

## MINIMUM REQUIREMENTS AND GUIDELINES

Each project is free to determine criteria for individual evaluations and the exact process that best suits the project's objectives, mission, culture, and values. The minimum requirement is to send written documentation of the review by January 31 of each year to the employee and NVF HR. Documentation may be NVF's evaluation form ([available on the Portal](#)), an evaluation form of the project's own design, or a memo or email. Supervisors must either meet with employees to deliver the review or send the written documentation of the review via email. Employees must provide written acknowledgment of receipt.

## NVF PERFORMANCE RESOURCES

Resources are available to supervisors and project staff to aid in the creation and delivery of reviews, including:

- An (optional) performance review form
- Guidance on setting goals for staff
- A list of sample competencies against which staff can be evaluated
- Guidance for conducting project director reviews
- HR is available to provide training as requested for supervisors and project teams on conducting effective performance reviews.

Questions about this process or about accommodations for unique circumstances should be directed to [HR@newventurefund.org](mailto:HR@newventurefund.org).

## PROMOTIONS, SALARY INCREASES, AND BONUSES

Project directors or supervisors who wish to initiate a promotion, salary increase, or bonus should submit requests to [HR@newventurefund.org](mailto:HR@newventurefund.org) for approval and processing prior to discussing with the employee. Requests should include amounts, effective dates, justification for the change, and a revised job description (if appropriate). Generally, promotions, salary increases, and bonuses will not be provided to poorly performing employees. All changes affecting employment status or compensation must be confirmed in writing from someone authorized to make decisions affecting the

project budget in order to be implemented.

### **SALARY DISCUSSIONS**

By law, no employee may be prohibited from inquiring about, disclosing, comparing, or otherwise discussing his or her compensation or the compensation of another employee. NVF will not terminate, discipline or otherwise discriminate against any employee because he or she discusses their own compensation or the compensation of another employee.

Employees are encouraged to first bring questions or comments regarding compensation to their supervisor, project director, or HR. Conversations may not be prohibited, but informal conversations may be inadequate to determine fairness or trends. Compensation is dependent on a mix of external and internal factors. External factors can vary based on the general health of the job market, the unemployment rate, the demand for certain industries and position types, and a variety of other factors related to granting and philanthropic trends. Internal factors may include the current and projected financial position of the project, equity within a project, demand for certain skills, and general equity across the managed organization. For all of these reasons, it may or may not be appropriate for management to share full context or data regarding compensation as concerns are raised. However, concerns about fairness, equity, or practices may be brought to the project director and/or HR for further evaluation.

### **PROGRESSIVE DISCIPLINE**

From time to time, supervisors or project directors may identify critical performance problems or unacceptable workplace behavior from employees. When a supervisor or project director identifies issues of this nature, or a combination of issues that amount to a serious matter, they should notify NVF HR to discuss engaging in a formal progressive discipline process. NVF encourages a consistent and structured approach to disciplinary action in order to facilitate critical performance improvements and to provide structured and clear communication to staff exhibiting unacceptable behavior. This policy outlines NVF's preferred approach of progressively increasing disciplinary action in order to provide employees with the opportunity and time to correct performance or behavior problems, when possible. Given the unique nature of NVF's structure as a fiscal sponsor, NVF reserves the right to combine or skip steps depending on the facts of each situation and the nature of the performance or behavior problem. Regardless of this policy, circumstances, or communications, NVF remains an at-will employer and reserves the right to terminate employment at any time for any reason, with or without notice.

Supervisors and project directors experiencing performance or behavioral problems with employees:

- Do not need to confer with NVF HR prior to providing ad hoc employee feedback
- Must notify NVF HR of employee performance or behavioral issues
- Must confer with NVF HR prior to engaging in a formal progressive discipline process

The below steps outline NVF's preferred process for progressive discipline, to be applied with NVF HR's guidance, if and when practicable:

#### **Step 1: Counseling and Warning**

Supervisors or project directors schedule a meeting with the employee to provide an explanation of the issue(s), guidance on a path to resolution, and a timeline for resolution (including immediate resolution, as appropriate). The supervisor or project director will prepare written documentation of the meeting that occurs under Step 1. The employee will be asked to sign this document to

demonstrate his/her acknowledgment of the conversation. If the employee refuses to sign the document, the supervisor or project director should send documentation to NVF HR of the meeting documentation and the employee's refusal to sign for the employee's file.

### **Step 2: Performance Plan**

In the event that the issue(s) persists, the supervisor and project director may initiate a performance plan. The supervisor or project director works with NVF HR to document a timeline for improvement, the exact improvements that are expected, and metrics for demonstrated improvement. Timelines will vary depending on the circumstances, but generally will not be fewer than two weeks or exceed 90 days. The supervisor and project director review the plan with the employee and formally begin the timeline. The employee is informed that if improvement is not achieved within the timeline's parameters, disciplinary action will be taken, up to and including termination. Supervisors or project directors check in with the employee regularly over the course of the plan (frequency will vary depending on the circumstances and the timeline for improvement).

### **Step 3: Recommendation for Termination of Employment**

In the event the employee fails to meet the improvements as laid out in the performance plan, the last and most serious step in the progressive discipline process is a recommendation to terminate employment. The project director should reach out to HR to make a recommendation for termination of employment.

### **Step 4: Termination of Employment**

NVF HR will review the recommendation and, if agreed, will approve the recommendation. NVF HR will provide the project director and/or supervisor with the appropriate documentation and guidance on how to communicate the termination to the employee. A project director or supervisor may never terminate an employee without approval and guidance from NVF HR.

### **Issues Not Subject to Progressive Discipline**

Behavior that is illegal is not subject to progressive discipline, and such behavior may be reported to local law enforcement authorities. Similarly, theft, substance abuse, intoxication, fighting, and other acts of violence or disruptive behavior at work are also not subject to progressive discipline and may be grounds for immediate termination.

## Expense Reimbursement and Travel Policies

---

### **TRAVEL POLICY OVERVIEW**

The purpose of this policy is to provide all employees who make travel purchases on behalf of NVF with an understanding of their roles and responsibilities in the purchasing process. Generally, employees should always seek the lowest-cost alternative, consistent with good business practices, when making purchases. Within the parameters of these policies, each project director will have discretion to set spending policies for her/his own project based on budgetary and cultural considerations. Every employee who makes purchases on behalf of a project is responsible for understanding prior to making any purchases what constitutes appropriate and economical spending within the project's particular context.

The objective of this policy is to ensure that all employees have a clear and consistent understanding of the policies and procedures for business travel and entertainment. By following these policies, NVF employees will be helping to ensure that NVF's use of resources is in keeping with charitable purposes and our donors' intents.

It is the responsibility of each employee to understand and timely comply with this policy prior to submitting expenses for reimbursement. Any questions or requests for guidance should be directed to the employee's project director or account manager. Expense reports will be reviewed regularly for compliance with these policies. By submitting an expense report, employees are representing that the expenditures incurred are in accordance with these policies.

Employees have a responsibility to submit an appropriately documented record of all expenses via NVF's expense reporting system. Appropriate documentation and detail must be provided for any expense \$75 and above. In the event a receipt is not available, employees need to provide an explanation and a missing receipt affidavit.

Employees should generally pay for travel, lodging, and rental fees using either an NVF or personal credit card.

No more than five employees may travel in the same plane, car, or other form of transit together.

#### **NON-REIMBURSABLE EXPENSES**

Several categories of expenses are not reimbursable under any circumstances:

- Employees will not be reimbursed for travel costs related to their commute to the office from their residences or from personal travel.
- Employees who work remotely from their home offices will not be reimbursed for rental or other usage charges for their home office space.
- Employees will generally not be given travel per diems.
- Employees will not be reimbursed for other expenses related to business travel unless expressly outlined in these policies.
- Employees will not be reimbursed for travel and entertainment expenses incurred by a spouse/companion, or any other individual who is not an NVF employee, who accompanies an NVF employee on business. A spouse/companion or other individual may accompany an employee on a business trip at the employee's own expense.

The above list includes examples and is not exhaustive. For specific questions regarding whether expenses are reimbursable, see [Appendix B: Expense Reimbursement Reference Guide](#).

#### **TRAVEL RESERVATION PROCEDURES**

Before booking any travel for business, employees should seek approval for the business travel from their project director.

In all cases, employees are expected to make reservations for travel as early as possible, to take advantage of advance purchase discount prices. When the employee is aware of an upcoming trip with adequate notice, it is expected that he/she will book the reservations prior to the two-week window, in order to ensure the lowest possible rates.

## **AIR TRAVEL RESERVATIONS**

Air travel reservations should be made directly through the airlines or through an airline travel service. Use of travel websites is encouraged, except for those travel websites that require non-refundable prepaid flights for travel.

Lowest available fare is standard policy for all flights. Business class is permitted only for international flights (arriving in a different country from the one departed) of more than eight hours and should be the lowest available at that class. Employees who have a layover of two or more hours may expense the purchase of a day pass to an airline club.

Between some cities, the lowest available fare requires stopovers and plane changes. If these routing requirements would add excessive time to the trip or to the departure/arrival time, it is permissible for employees to select a direct flight, even if it is not the lowest-available fare.

Upgrades are permitted, but generally at the employee's personal expense. In most cases, upgrades may not be charged on an NVF credit card, nor submitted for reimbursement. With prior approval, an upgrade may be allowable as a reimbursable expense if compelling business reasons for the upgrade exist.

Employees are responsible for handling all cancellation activities directly with the airline or travel agent. Employees will be responsible for fees related to cancelling or modifying their travel reservations, except in circumstances in which modification or cancellation is unavoidable or outside of the employee's control.

## **RAIL TRAVEL RESERVATIONS**

Lowest available business class fare is allowed for non-commuter rail travel.

## **INTERNATIONAL TRAVEL & FEES**

Employees are responsible for obtaining a passport and visas for international travel sufficiently in advance of the trip. No more than five employees may travel together on the same international flight.

NVF will reimburse expenses for passports, visas, and country entry/exit fees required for travel related to NVF business. NVF will not reimburse expediting fees except in the instance where last-minute business was required and the project director approved.

NVF will reimburse for currency exchange fees. This does not include currency exchange gain or loss.

## **RENTAL CAR GUIDELINES**

Employees are expected to consider the costs of all travel options when arriving at their destination to determine if it would be more efficient and cost effective to walk, take public transportation, pay for a taxi, or rent a car.

If a rental car is decided to be the best option, employees may make reservations through a rental car service or travel website. Employees should avoid using travel websites that require a non-refundable prepayment for rental car reservations.

Employees can request a compact or midsize vehicle for NVF business travel. Rentals of other types of cars are not permitted, except with project director prior approval. Luxury, premium, and specialty

car rentals will be reimbursed only at the current compact or midsize car rates.

At the time of rental, the car should be inspected, and any damage found should be noted on the contract before the vehicle is accepted.

Employees are responsible for handling all cancellation activities directly with the rental car company or travel agent.

Every responsible effort should be made to return the rental car:

- To the original rental city unless approved for a one-way rental
- Intact, with no bumps, scratches , or other physical damage
- On time, to avoid additional hourly charges
- With a full tank of gas

Should a rental car accident occur, travelers should immediately contact the rental car company, local law enforcement authorities, as required, HR, and the account manager.

Penalty expenses incurred for not following these guidelines will not be reimbursed unless they were incurred due to circumstances outside the employee's control.

#### **DOMESTIC RENTAL CAR INSURANCE**

When on business travel in the United States, all NVF employees are covered by the NVF corporate liability insurance policy. Employees who use the NVF corporate credit card to pay for rental cars used on business travel in the United States will have physical damage coverage for the rental vehicle. Consequently, employees are encouraged to use the NVF corporate card to pay for rental cars and, under these circumstances, employees should waive both physical damage and liability insurance coverage from the rental car company when traveling on business in the United States.

#### **INTERNATIONAL RENTAL CAR INSURANCE**

When on international business travel, all NVF employees are covered by the NVF corporate liability insurance policy. Employees who use the NVF corporate credit card to pay for rental cars used on international business travel will have physical damage coverage for the rental vehicle. Consequently, employees are encouraged to use the NVF corporate card to pay for rental cars and, under these circumstances, employees should waive both physical damage and liability insurance coverage from the rental car company when traveling on international business.

#### **PERSONAL CAR USAGE GUIDELINES**

Employees may use their personal car for business purposes if they have both a valid driver's license and current comprehensive auto insurance, including liability. When an employee uses his or her personal automobile on approved NVF business, NVF will pay the current per-mile business rate set by the IRS. NVF will also reimburse all tolls and parking fees incurred during business travel. To receive reimbursement for personal car business travel, the employee must include in the Concur report:

- Purpose of the trip
- Date(s)
- Start and end locations
- Receipts for tolls, and/or parking

Employees assume the responsibility for all parking and traffic fines and violations.

### **TAXIS AND LOCAL TRANSPORTATION**

Employees may submit requests for reimbursement for taxis, shared ride services, and local public transportation used for travel associated with business. Reimbursement requests will be honored for travel to and from the airport, client meetings, business dinners, and approved NVF functions. All other requests must be authorized by a project director for approval. Employees are encouraged to walk to destinations or use public transportation whenever feasible.

### **AIRPORT TRANSPORTATION**

Employees are expected to select transportation to and from the airport in keeping with the NVF policy of seeking travel options that are comfortable and economical. Depending on the circumstances, this would mean choosing public transportation, airport vans/shuttles, or taxis. Limousines or car services should not be chosen unless there is no acceptable alternative and only with the approval of the project director.

### **INTERNATIONAL CALLS**

Employees who plan to travel internationally on behalf of NVF should receive approval from their project director to register for any applicable international voice and data plans for their personal mobile phones. If approved in advance of the international business travel, NVF will reimburse for these additional charges, as well as any other related charges incurred.

If any employees are traveling internationally for personal reasons and they are required to stay in touch with project activities, they should seek approval from their project director to expense any voice and data charges incurred while conducting NVF business.

### **HOTEL RESERVATIONS**

Hotel reservations may be made through a travel website or through the hotel directly. Employees should avoid travel websites that require prepayments, as many of these services offer non-refundable reservations. Employees should make every effort to understand budget constraints and donor expectations and requirements when spending travel dollars. **Further, the IRS requires itemized receipts for lodging expenses, regardless of dollar amount.** Employees must submit itemized receipts and not just credit card statements for all lodging expenses to receive reimbursement.

- Lodging selections must be no higher than a four-star or four-diamond rating in the United States or the international equivalent.
- Employees are responsible for handling all cancellation activities directly with the hotel or travel agent. NVF will not reimburse hotel “no show” fees, unless approved by the project director.
- Employees must be offered an individual room for sleeping accommodations when traveling on business and may not be required or asked to share accommodations. The employee may request an exception to this policy from Human Resources by contacting [hr@newventurefund.org](mailto:hr@newventurefund.org).
- Reasonable gratuities will be reimbursed by NVF for services such as housekeeping, luggage handling, parking attendant, etc.
- Laundry and valet expenses may be reimbursed if an employee is requested by NVF to extend regularly scheduled trips, or if a trip requires an employee to be away from home for more

than five days.

### **MEALS AND ENTERTAINMENT**

Personal meals are defined as meal expenses incurred by the employee for him/herself on an out-of-town business trip. Employees will be reimbursed for personal meal expenses according to actual and reasonable cost.

Reimbursements may include a gratuity of up to 20% of the bill. NVF will allow for up to \$100 per day to cover personal meals (including any daily combination of meals, snacks, beverages, tax, and tip). This is a maximum amount, not an allowance.

### **BUSINESS MEAL EXPENSES**

Occasionally, a staff member may need to entertain external parties for business purposes. Entertainment expenses are reimbursable only with the employee's project director's prior approval, and must meet the following conditions:

- Costs do not exceed more than \$50 per person without specific approval
- The employee's specific assignment requires the entertainment of the client or potential client, as appropriate
- The expense reimbursement request specifies the name and company/affiliation of the person entertained and the business purpose for doing so

### **CLIENT POLICIES**

If a client has a contractual obligation to pay for certain or all types of expenses related to a project for which an NVF employee is incurring expenses, the NVF employee is required to follow the client's reimbursement and expense policies related to those types of expenses only. Under these circumstances only, the client's policies supersede those in this document.

### **INTERNATIONAL EXPENSES**

When international expenses are claimed for reimbursement, NVF requires justification of the exchange rate used, such as a receipt of the actual rate at which the money was exchanged or via an Oanda printout.

### **CORPORATE CREDIT CARDS**

Corporate credit cards are provided to employees based upon business need, and at the discretion of the employee's project director and NVF. The cards are to be used for purchases required by NVF business. Employees who receive a credit card will be required to sign and abide by the terms of a separate credit card policy.

Under no circumstances should a corporate credit card be used for personal charges of any kind. Credit card purchases should follow the NVF policies outlined in this handbook under the section "Expense Reimbursement and Travel Policies."

Cardholders must submit all transactions using Concur **within sixty (60) days of the purchase date**. Failure to submit credit card expense reconciliations within 60 days will result in NVF halting reimbursement of all personal expenses and putting the credit card on hold. Continual tardiness or misuse of the card will result in revocation of the card and denial of credit card usage privileges

## **CORPORATE CREDIT CARD USAGE BENEFITS**

Any benefits (e.g., mileage rewards, discounts) accrued through use of the NVF corporate credit cards are retained by NVF and do not convey to the employees.

## **EXPENSE REPORTING**

Employees must obtain and retain receipts for all expenses \$75 or more as well as all lodging expenses regardless of amount. NVF will provide each employee with access to Concur, NVF's expense reporting platform, for reconciling credit card charges and submitting for reimbursement of discretionary benefits or other valid business expenses paid by the employee. The employee will create a monthly report in Concur containing all transactions for that month. Credit card purchases should follow the NVF policies outlined in this handbook under the section "Expense Reimbursement and Travel Policies." The cardholder must submit all transactions using Concur **within sixty (60) days of the purchase date**. As a best practice, NVF encourages employees to submit the report **by the fifth of the month** so that the transactions can be included in the previous month's financials.

Employees must submit the following documentation through NVF's expense reimbursement system:

- Air/rail: Invoice/itinerary or credit card receipt
- Hotel: Hotel folio/itemized receipt for all charges regardless of amount plus credit card receipt or other proof of payment
- Car rental: Rental car agreement plus credit card receipt or other proof of payment
- Meals and Entertainment: Credit card receipt or cash register receipt, list of attendees and business purpose
- Receipts for any miscellaneous expenses over \$75

Receipts must include the name of the vendor, location, date, and dollar amount. Each meal (breakfast, lunch, and dinner) must be recorded separately in the expense report.

In order to receive reimbursement for valid business expenses incurred by employees personally, employees must submit for reimbursement within 60 days, and with appropriate supporting documentation.

Those authorized to approve expenses are responsible for ensuring all expense reimbursement guidelines and policies are adhered to for the expenses they approve. By the act of approving expenses, they represent that they have confirmed adherence to these policies.

## **PRE-AUTHORIZATION**

Project directors may choose to pre-authorize certain rules for incurring expenses in order to ensure streamlined operations. This is in place of having to pre-approve every individual instance of an expense that may otherwise require pre-approval. Under no circumstances can an expense approver circumvent reviewing and approving expenses after the fact via Concur.

## APPENDIX A: Benefits Eligibility by Employment Classification

Note that benefits eligibility is determined by employment classification and is mandatorily applied based on the employment classification, as designated by NVF HR.

Benefit	Regular, Full-Time (30+ hrs/wk)	Regular, Part-Time (20+ hrs/wk)	Regular, Part-Time (Fewer than 20 hrs/wk)	Temporary, Part-Time	Temporary (Including interns)
Medical	✓	✓	✗	✗	✗
Dental	✓	✓	✗	✗	✗
Vision	✓	✓	✗	✗	✗
Health Reimbursement Account (HRA)	✓	✓	✗	✗	✗
Retirement	✓	✓	✗	✗	✗
Paid Leave	✓	✓	<i>Personal Leave Only</i>	<i>Personal Leave Only</i>	<i>Personal Leave Only</i>
Voluntary Life	✓	✓	✗	✗	✗
Flexible Spending Account (FSA)	✓	✓	✓	✗	✗
Pre-Tax Transportation	✓	✓	✓	✗	✗
Disability	✓	✗	✗	✗	✗
Life	✓	✗	✗	✗	✗
Fitness	<i>Varies. See offer letter</i>			✗	✗
Smartphone	<i>Varies. See offer letter</i>			✗	✗

## APPENDIX B: Travel and Expense Reimbursement Reference Guide

Expense	Will NVF Pay for This?	Limitations
<b>Air travel</b>	Yes	<ul style="list-style-type: none"> <li>• Lowest-available fare</li> <li>• Upgrades are not reimbursable</li> </ul>
<b>Airport van/shuttle</b>	Yes	
<b>Commuting costs</b>	No	
<b>Home office space rental</b>	No	
<b>Hotels</b>	Yes	<ul style="list-style-type: none"> <li>• Lodging selections must be no higher than a four-star or four-diamond rating in the United States or international equivalent</li> <li>• Always requires a detailed receipt</li> <li>• NVF will not reimburse hotel “no show” fees</li> </ul>
<b>Laundry and valet fees</b>	Yes	<ul style="list-style-type: none"> <li>• Only if NVF requests the employee to extend regularly scheduled trips, or if a trip requires an employee to be away from home for more than five days</li> </ul>
<b>Limousine/car service</b>	No	<ul style="list-style-type: none"> <li>• Only if no other option is available, and with project director approval</li> </ul>
<b>Meals – business, client</b>	Yes	<ul style="list-style-type: none"> <li>• Costs do not exceed \$50 per person</li> <li>• The expense report specifies the name and company/affiliation of person entertained</li> </ul>
<b>Meals – travel, personal</b>	Yes	<ul style="list-style-type: none"> <li>• Actual and reasonable cost</li> <li>• Limited to \$100 per day</li> </ul>
<b>Parking fees and tolls</b>	Yes	
<b>Parking fines/traffic violations</b>	No	
<b>Personal cars</b>	Yes	<ul style="list-style-type: none"> <li>• Business miles reimbursed at the IRS rate</li> <li>• Must carry personal comprehensive insurance</li> </ul>
<b>Personal sundries</b>	No	
<b>Public transportation</b>	Yes	
<b>Rail travel</b>	Yes	<ul style="list-style-type: none"> <li>• Lowest-available fare</li> <li>• Upgrades are not reimbursable</li> </ul>
<b>Spouse/companion travel</b>	No	
<b>Taxi</b>	Yes	
<b>Tips/gratuities</b>	Yes	<ul style="list-style-type: none"> <li>• Reasonable tips for housekeeping, parking attendant, luggage handling, etc.</li> </ul>
<b>Travel fees</b>	Yes	<ul style="list-style-type: none"> <li>• Passport, Visa applications, foreign country entry/exit, and currency fees (excluding currency exchange gain/ loss) are reimbursable for international travel</li> </ul>

## APPENDIX C: Contact Information

---

**For harassment claims, general inquiries, or policy suggestions or changes, contact NVF HR:**

- General: [HR@newventurefund.org](mailto:HR@newventurefund.org)
- Gideon Steinberg, Director of Human Resources:
  - [gideon@newventurefund.org](mailto:gideon@newventurefund.org) or (202) 595-1038

**For whistleblower claims:**

- General Counsel – [generalcounsel@newventurefund.org](mailto:generalcounsel@newventurefund.org) or 1201 Connecticut Avenue NW, Suite 300, Washington, DC 20036

**For information on use of benefits, timelines, or carrier contact information:**

- Email [HR@newventurefund.org](mailto:HR@newventurefund.org)
- Or see the HR section of the NVF Portal at: <https://newventurefund.sharepoint.com/Pages/Human-Resources.aspx>