Congratulations and welcome to Michigan Blood!

You have been asked to join our staff because of your abilities, experience and the quality of your past performance. Every job in our company is important, and you will play a key role in the continued growth of our company.

As you will discover, our success is based on delivering high quality blood products and providing unsurpassed customer service. How do we do it? By working very hard, thinking about our customers' needs, and doing whatever it takes. We do it by treating each other and customers with respect. We do it by acting as a team.

This handbook outlines the basic policies, benefits and expectations related to your employment. Your first task as an employee of Michigan Blood is to thoroughly read this handbook, and direct any questions you have to your supervisor.

Welcome to our lifesaving team!

CERTIFICATION

I certify that I have been shown the location of the Michigan Blood Employee Handbook within the Michigan Blood computer network and understand it is available to me in electronic form.

I agree that it is my responsibility to read and understand the handbook policies.

I agree to abide by and comply with all the terms and conditions outlined in the handbook. I understand that the handbook outlines Michigan Blood policies, benefits and programs that affect my employment except as specified in my employee contract. I understand that I have the right to terminate my employment at any time, for any reason or for no reason upon notice set forth in these policies, and that Michigan Blood has the same right to terminate my employment for any reason or for no reason. I further understand that no one, except the CEO/President, has the authority to enter into any agreement with me, which alters the personnel policies, benefits and programs outlined in the handbook.

Please Print Name		
	Date:	
Employee Signature		

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OUR MISSION

Helping people make a lifesaving difference through blood products and service excellence.

OUR VISION

By 2018, Michigan Blood will be the biggest and best provider of blood components and services in Michigan.

OUR CORE VALUES

- SAFETY, Michigan Blood's top value, guides and prioritizes everything we do.
 - A few examples of SAFETY at work: Giving top priority to caring for someone who experiences a reaction after donating...Employing Standard Operating Procedures (SOP) and Good Manufacturing Practices (GMP) to ensure product safety for hospitals and patients ...Knowing and applying best practices for personal and workplace safety.
- **INTEGRITY,** second in Michigan Blood's hierarchy of values, commits us to act in ways that are morally and ethically responsible. A few examples of INTEGRITY at work: Being accountable for your decisions, actions, and results...Doing what you say you will do... Being objective and fair in your regard for others and in your judgments.
- **SERVICE** comes third among our values: helping others is at the heart of Michigan Blood's mission and our commitment to service. A few examples of SERVICE at work: Extending a personal greeting to everyone you encounter... Courteously helping a donor, client, volunteer, guest, or coworker...Promptly and reliably fulfilling orders for blood products that meet the needs of our hospital clients.
- STEWARDSHIP, fourth in Michigan Blood's values chain, guides us to use all resources to best advantage.

 A few examples of STEWARDSHIP at work: Creating realistic budgets, controlling expenses, and living within our means...Managing blood donations to achieve a steady flow of blood coming in...Managing blood inventory to minimize outdating products.
- TEAMWORK is our final value: working together provides the ideas, energy, and strength to achieve goals beyond the scope of one person.

A few examples of TEAMWORK at work: Offering ideas and assistance to fulfill the team's agenda (rather than your own)...Turning to other team members for help when you need it... Using your skills and abilities as requested to help achieve a collective goal.

EMPLOYMENT STATUS AND EMPLOYEE HANDBOOK

Upon employment with Michigan Blood, the employee is designated a "new employee" and is subject to an initial qualifying period. The qualifying period may be extended as deemed necessary by the supervisor. New employees may be evaluated during this period at the discretion of the supervisor.

The employee is designated as a full time, part time, casual or temporary employee. This designation will impact eligibility for benefits outlined in this handbook.

Full Time Employee – An individual who has completed the qualifying period and who is generally required to work at least 72 hours per pay period as scheduled by the supervisor.

Part Time Employee – An individual who has completed the qualifying period and who is generally required to work less than 72 hours but at least 32 hours per pay period as scheduled by the supervisor.

Casual Employee – An individual who has completed the qualifying period and who is generally required to work less than 32 hours per pay period as scheduled by the supervisor. These employees receive limited employment benefits.

Temporary Employee – An individual who is hired for a period of limited duration (normally not to exceed six months) and is required to work as scheduled by the supervisor.

No contract is made with an employee, which constitutes a pledge of employment. An employee's services may be involuntarily terminated at any time, for any reason, or for no reason, including on the basis of the needs of Michigan Blood or at any time when the employee's performance does not measure up to the job requirements, standards or policies of Michigan Blood. The employee has the same right to terminate his or her employment at any time, and for any reason, subject only to the notice requirements set forth in the Termination Policy, Section 21.

Your employment with Michigan Blood is terminable at will, either by you or by Michigan Blood. Employment may be terminated for any reason or without any reason, either by you or by Michigan Blood. Neither this Employee Handbook nor any other document given to you or which you may have seen constitutes a contract of employment or a pledge of employment for any period of time.

No one except the CEO/President of Michigan Blood has the authority to enter into any agreement with any employee which alters employment status, severance policies, Michigan Blood policies, benefits or programs outlined in the Employee Handbook, and any such agreement must be in writing to be effective.

These policies shall be reviewed periodically by the Board of Directors and the President/CEO, to whom authority is delegated for review and revision. Michigan Blood reserves the right to alter, delete, or add to any of the provisions and the benefits set forth herein, at any time, with or without prior notice. Nothing in the Employee Handbook is to be construed as a contract for employment or as a part of any separate or broader contract for employment.

RISK MANAGEMENT AND SAFE CONDUCT POLICY

SAFETY

Michigan Blood's safety program was established so that safety training and policies will create a place of employment reasonably free from hazards leading to illness, injury, or death. It is also Michigan Blood's intent to comply with all governmental laws, regulations, and guidelines pertinent to its operations.

Safety is the responsibility of all Michigan Blood staff: Safety Liaisons at each location and the Director of Safety and Donor Advocacy are responsible for providing guidance and assistance in incident/accident prevention and investigation. Supervisors are accountable for the safety of their staff and are encouraged to consider safety when making purchases and directing daily departmental operations. Employees are responsible for protecting themselves and for considering the safety of coworkers, donors, associates, and property. All individuals are expected to comply with safety policies and report unsafe actions, materials, and/or incidents to their supervisor and/or local safety liaison immediately.

WORKPLACE INCIDENTS/ACCIDENTS

All incidents, accidents, or injuries involving staff, donors, volunteers, visitors, contract workers, and/or the facility itself must be documented on an Incident/Accident Report and forwarded to the appropriate supervisor or designee. Incidents/accidents may occur on Michigan Blood property or in the community (at mobiles, on roadways, or any other on-the-job situation). These situations must also be verbally reported to the supervisor or designee immediately.

Incidents are any occurrence which is inconsistent with routine operations. Examples include (but are not limited to): fire, property damage, large or hazardous spills, vehicular accidents without injury, equipment failure, theft, losses, disasters, or unsafe conditions.

Accidents include (but are not limited to): Falls, sprains/strains, cuts, vehicular accidents with injury, allergic or other reactions, or any other injury. The employee may be referred to a healthcare provider for more complete care by the supervisor or designee if necessary.

Blood exposures are reported on a Blood Exposure Report available at all Michigan Blood sites and mobiles and forwarded to the Michigan Blood's Safety Officer. A Blood Exposure Report must be completed every time an individual has a needlestick, is exposed to blood on his/her skin, face, eyes, nose, or mouth, and/or is exposed to a potentially contaminated item.

SAFETY TRAINING

Each new staff member will receive basic safety training on or before his/her first day of work. In addition, advanced safety training is provided to individuals with job duties which potentially expose them to blood. A detailed summary of these training modules and which job tasks are at risk for blood exposure is provided in the Michigan Blood Safety Manual. Additional training is required of certain staff, e.g. annual safety training, lockout competency, transportation safety, etc., and this is also summarized in the Safety Manual.

RISK MANAGEMENT

Risk management is defined as Michigan Blood's efforts to protect against and minimize potential human, financial and operational losses (these are known as "accidental" losses). In general, any incident that results in pain and suffering or financial loss, or any threat of legal action, should be reported immediately.

Risk management is an important part of everyone's job. Managing risk is crucial to the success of Michigan Blood's operations. One of the most important elements of risk management is rapid reporting of any incident or injury (actual or alleged). The length of time it takes to respond to an incident often directly impacts the size of the loss. Swift reporting of incidents and accidents to one's direct supervisor and/or safety liaison can help contain accidental loss.

Some specific examples of incidents requiring rapid reporting include:

- Slips, falls or other injuries to any individual requiring medical care beyond first aid.
- Donor reactions requiring medical care beyond first aid.
- Donor arm injuries.
- Alleged transfusion-associated incidents.
- Any case involving individuals who threaten legal action or are seeking compensation beyond expenses from Michigan Blood.

Risk management incidents should immediately be brought to the attention of one's direct supervisor or any appropriate member of management.

WEAPONS

Weapons are **not** allowed on Michigan Blood's property (including outbuildings and vehicles) or at off site Michigan Blood functions (e.g. mobiles, meetings, or outside activities) unless in the possession of an individual licensed in the state of Michigan to carry them (e.g. police officers or other non-Michigan Blood persons).

Staff may not be in possession of weapons when on-the-job, when conducting Michigan Blood business, or when representing Michigan Blood. Persons found in possession of such weapons are subject to termination.

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Weapons include (but are not limited to): Firearms, tear gas/mace, explosive devices (unless part of a sanctioned construction project), or any other object possessed for the sole purpose of inflicting injury.

EMERGENCY SITUATIONS

Fire safety and other emergency training are provided to all new staff and are available in the Michigan Blood Safety Manual. Fire drills are held annually at all primary Michigan Blood locations.

SMOKING POLICY

In order to maintain a safe and healthy atmosphere, a "smoke free environment" is maintained in all Michigan Blood outbuildings and vehicles. All persons are required to comply with these regulations.

SECURITY

As an employee of Michigan Blood, active employees are given a security access code, key, or fob, which allows entry into the building. No employee may give the code, key, or fob to anyone else. Employees should enter the facility through the designated staff entrance.

Unknown individuals should not be allowed entrance into a company facility without first identifying themselves, stating what business they wish to conduct, and who they wish to see. The appropriate employee or department should be notified and that party must meet their visitor at the entrance.

With the exception of blood donors, all individuals that are not employees or volunteers must wear a visitor's badge or other visible identification or be escorted by the person they are visiting while at the facility.

Vendors, contractors, consultants, service techs, etc., who are not escorted or do not have immediate access to a trained employee or volunteer, must first receive Michigan Blood safety training appropriate to their tasks.

Staff parking is designated at each location. Please park in the appropriate parking area and not in spaces reserved for blood donors or visitors.

Security violations should be reported immediately to an appropriate supervisor or designee.

VEHICLE SAFETY

- Staff are not to transport unauthorized passengers in company vehicles.
- Staff must obey all traffic laws and practice safe driving habits.
- As Michigan Blood representatives, staff will drive in a safe and courteous manner.

- Staff and passengers must not litter.
- Staff must notify their supervisor when a vehicle requires routine maintenance, has a mechanical problem, or is otherwise unsafe.
- Staff must complete vehicle records, logs, etc., as required by Michigan Blood.
- Staff and passengers cannot smoke in company vehicles.
- Staff must not drink alcohol or use illegal substances before or during their work shift or while on call--medications that may cause drowsiness must be discussed with supervisor.
- Staff ticketed for driving under the influence (DUI) while operating company vehicles will face severe disciplinary action up to and including termination.
- Staff must pay fines incurred by violating city, state and traffic laws.
- Cell phones may be used by drivers only if vehicle is parked or if there is an emergency.

EMPLOYMENT RECORDS, REFERENCES AND SOCIAL SECURITY NUMBER PRIVACY POLICY

It is required that every employee notify his/her supervisor and the Human Resources Department of his/her correct home address and telephone number. This information will only be used for work related matters. All personnel records are maintained at Michigan Blood's Headquarters in Grand Rapids, Michigan.

The Human Resources Department will be the only department to release employment information about current and former employees, including verification of employment. The only information that will be released without written authorization from the employee is the position held and the dates of employment.

An employee who anticipates and/or desires a response to reference inquiries (i.e., for new employment, credit, etc.) may provide advance written authorization to the Human Resources Department for release of information. This authorization must specify which information can be released and to whom.

Upon request, an employee may review his/her own personnel file. The review of any personnel file must be done in the presence of a representative of Human Resources. An employee requesting copies of documents contained in their personnel file will be required to reimburse Michigan Blood \$0.15 per copy. Additional charges may apply for document retrieval or third party fees.

SOCIAL SECURITY NUMBER (SSN) PRIVACY

All employees are required to have a Social Security Number in order to be employed by Michigan Blood. This is required for payroll purposes and adequate tax reporting. Michigan Blood takes each employee's privacy very seriously and it maintains a strict policy to protect the confidentiality of Social Security Numbers that are obtained by or provided to Michigan Blood and/or its employees, members, contractors, agents and representatives in the course of their employment, activities, or services performed on behalf of the company.

Documents containing Social Security Numbers are kept in confidential files, except as required by necessary and legitimate business purposes. Access to documents containing SSNs will be limited to authorized Michigan Blood staff with a necessary and legitimate business need for those documents.

No unauthorized employee is permitted to have access to SSNs (including documents that contain any SSNs) or keep, view, use, copy, disclose, or distribute another person's SSN, or in any other way disclose another's SSN. One who accesses a SSN for necessary and legitimate business purposes is prohibited from using or accessing the SSN in a manner that may permit an

unauthorized individual to view, use, or access the number.

When documents containing SSNs are no longer needed and are discarded, such documents must be disposed of in a manner that ensures the confidentiality of the SSNs. Michigan Blood has developed a practice for shredding, electronically deleting, or otherwise disposing of confidential records, including documents containing SSNs.

VERSITI COMPUTER ACCESS, USE, AND SECURITY POLICY

Purpose

To describe the following Versiti policies relating to Information Technology/ Information Services (IT/IS) computer systems:

- A. access
- B. use
- C. security

Note: Versiti users are required to abide by these over-arching policies. Affiliates have developed processes and procedures, unique to their institutions, in support of these policies.

Scope

These policies govern Versiti's management of all IT/IS supported systems that store or transmit data electronically for Versiti, whether they are accessed through PCs, workstations, mobile devices (e.g., tablets, phones, etc.) or workstations physically located within Versiti buildings or accessed remotely. These policies also govern system data and personal devices.

This document also includes policies which are required to protect affiliate information assets in order to safeguard its customers, intellectual property and reputation. As such, these policies apply to business data (in addition to data protected by HIPAA standards).

In addition, if a user is granted access to an affiliate or business partner's network and information, the user must comply with the policies and procedures of the affiliate or business partner regarding the use of computing devices to access, receive, transmit, or store information.

Note: All affiliate-provided software, hardware, and system data is considered property of the affiliate. This property is to be used for professional purposes only unless otherwise authorized by management. Removing any hardware or software from affiliate premises without management authorization is considered theft and a serious violation of these policies.

Compliance

Failure to comply with this and related policies may result in disciplinary action as described in Human Resources policies.

IT/IS reserves the right, but not responsibility, to monitor computer activity, as well as revoke access when users fail to comply with computer access, use, and security policies. Users are also subject to laws and regulations, as described in the *Computer Use, Electronic Signature Policies*, and *Computer Security* sections of this document.

Definitions

Term	Definition		
Business Partner	Affiliates and customers		
Computer Systems	All IT/IS supported systems, the network, and applications that reside on or access Versiti computer platform(s), as well as all related equipment and peripherals, such as servers, workstations, PCs, printers, and internal and external access to email service, the Internet, the		
	organization's Intranet, and portals.		
ePHI	Electronic protected health information (ePHI) refers to any protected health information that is covered under HIPAA security regulations and is produced, saved, transferred or received in an electronic form.		
HIPAA	The Health Insurance Portability and Accountability Act of 1996 (HIPAA). See page 11 – HIPAA Regulations Overview.		
PHI	Personal or protected health information (PHI) is a record of a donor's / patient's treatment and medical history that includes personally identifiable information.		
Personal Computing and Mobile Devices Definition System Data	Wireless or portable electronic devices that are not fixed at an affiliate facility, including but not limited to, personal laptops, notebooks, smart phones, air cards, tablets (e.g., iPad), and home computers. Data received by, entered into, created by, stored on, transmitted by, or printed by Versiti computer systems.		

User	Any individual who accesses Versiti computer systems, applications, or equipment, including both employees and non-employees. The user may be conducting activity related to installation, development, maintenance, administration or any other use of the systems. Non-employees include consultants, temporary staff provided by employment agencies, federal work-study student workers, etc. Non-employees, as defined above, are included in all references to "employee" and
	"user" throughout this document.

Computer Access Policies

Management Responsibilities

Management must:

- Ensure training is completed before access is granted. In instances where access is granted to enable training to occur, management (designee) oversees activities.
- Request and authorize access or inform IT/IS of approved management designee.
- · Request remote access on behalf of their users.
- Request emergency access, in the event that a user requires emergency access to another user's data, with executive level management approval, through a Service Desk request. IT/IS will log the request, grant the access, and notify the affected user.
- Notify IT/IS, via standard process, when a user's responsibilities have changed, such that he/she no longer requires access.
- Notify IT/IS, via standard process, when users terminate employment.
- Submit requests for exception access for termed users (see *Removing Access*, below).
- Support annual access review and provide changes to IT/IS.

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Granting Access

- · Access is granted based on business need.
- A user is given a unique login ID and password for network access only
 after the user has received prescribed training. With network access, a
 user has access to email, calendar, contacts, specific folders, MS Office
 products, and the Internet.

Note: Access to additional applications that reside on the network requires users to be trained on the use of the respective applications. This training is completed in keeping with the organization's training policies.

- Remote access Remote access is to be used only for professional purposes, and only by the user for whom the account was established. Remote access is limited to users who must access systems outside of work as part of their job responsibilities. Users of remote access software must have an assigned login ID and password. The remote access station must have virus protection. Users must agree to install software patches if necessary.
- The type of remote access granted is based on job type and business need.

Removing Access

Access is revoked effective the last day of employment. This applies to voice mail, email, and other files stored on a user's affiliate-owned computer or assigned space on the network

Note: Exceptions to this policy may be made in rare instances, where access is required due to business need. The affiliate reserves the right to retain and access electronic files stored on affiliate computer systems and may reassign ownership of voice mail, email, and other files for a defined period of time. Exception requests must be submitted to the Service Desk.

All user devices (smart phone or tablet) that have been used to access and store system data (email, text messages, voice mail) must be presented to IT/IS no later than the last day of employment so that system data and remote access can be removed. IT/IS reserves the right, but not responsibility, to remotely wipe any user device that contains system data or has remote access.

Access Support

- IT/IS will assist users in connecting their personal and mobile devices as required for their work such as email, calendar, contacts. Requests must be made to the Service Desk. IT/IS personnel will not assist with access that is non-work related.
- Additional access to systems and data (remote applications) will only be provided via tools such as VMware, virtual desktop or other secure remote access software as required based on job type and business need.

Access Review / Documentation

- Access is reviewed annually.
- Access documentation is retained in keeping with governing standards and regulations.

Computer Use Policies

Versiti provides a broad spectrum of computer systems to support users in their work. Use of Versiti computer systems is accompanied by a mandate for responsible and professional use. Every user has a responsibility to maintain and enhance Versiti's public image and to use computer systems in a productive, professional manner.

These policies describe the acceptable and unacceptable use of software, hardware, system data, for affiliate-owned equipment and user owned personal mobile devices when those devices are used to conduct Versiti business. In addition, monitoring policies, password policies, and policies for use of electronic signatures are described.

<u>Public computers, such as those found at a city library, must not be used</u> <u>to conduct any affiliate business.</u> Use of public networks is not preferred, but acceptable, if proper remote access technologies are used.

Social
Media
Acceptable
1
Unaccepta

The Social Media Policy is intended to provide guidelines for the proper use of public display on social media sites. It is important that users conduct themselves in a respectful, responsible manner when using social media and networking sites.

Unaccepta ble Use

For the complete policy, see your Human Resources Department.

Email Acceptable / Unaccepta ble Use

Unsolicited email should be deleted immediately and if delivery persists, users should forward the email message to the Service Desk, who will then take action necessary to block further email from that address.

The following uses are unacceptable and are prohibited:

Sending unsolicited email messages, including the sending of "junk mail" or advertising material to individuals who did not specifically request such material.

Any form of harassment whether through language, frequency, or size of messages.

Unauthorized use, or forging, of email header information.

Creating or forwarding chain letters or other pyramid schemes of any type.

"Spoofing" (i.e., constructing electronic communications to appear to be from

somebody else) without permission. Each user's name, email address, organizational affiliation, time and date of transmission, and related information included with email messages must always reflect the true originator, time, date, and place of origination, as well as the original message's true content.

Internet Acceptable / Unaccepta ble Use

Access to the internet is provided as a tool for users in their daily work as required. Users should not use this access for non-business purposes. Further, Internet websites are a potential source of viruses. Affiliates block sites that are not considered necessary for daily work and sites that may be harmful. If access to a blocked site is required due to business need, the user's manager should email the ServiceDesk.

It is unacceptable and prohibited to use an affiliate's internet connection: to visit pornography, terrorism, espionage, theft, drugs, piracy, or gambling sites.

for personal gain such as selling access of an affiliate user login. Affiliate's internet connection shall not be used for performing work for personal profit.

for interception of network traffic for any purpose unless engaged in authorized network administration.

to make or use illegal copies of copyrighted material, to store such copies on affiliate's equipment, or to transmit these copies over affiliate's network.

using mechanisms to mask or hide your identity/location.

to transmit individually identifiable PHI, unless the information is encrypted and is being transmitted for valid business reasons.

Note: Only company-owned laptops may be connected to the Versiti-Secure Internet SSID.

System Data Acceptable / Unaccepta ble Use

System data includes all data received by, entered into, created by, stored on, transmitted by, or printed by affiliate computer systems. All system data are affiliate property. System data is proprietary and may not be used for any purpose unrelated to affiliate business nor sold, transmitted, conveyed nor communicated in any way to anyone outside of affiliates without management's express authorization.

The following uses are unacceptable and are prohibited:

Accessing system data of which the user is not an intended recipient or logging into an account that the user is not expressly authorized to access, unless these duties are within the scope of regular duties.

Accessing system data that the user does not need in order to complete the user's job functions.

Disclosing any proprietary affiliate or business partner information without prior written consent.

Software
Application
s and
License
Agreement
s
Unaccepta
ble Use

The following sections include information relating to software/applications. The following uses are unacceptable and are prohibited:

Downloading software without prior documented approval from IT/IS. Downloading games or using "sharing" programs that provide no business value.

Installing any copyrighted software for which the affiliate does not have an active license. Unauthorized duplication of software violates copyright law.

The following points are to be followed to comply with software license agreements:

All users must use all software in accordance with license agreements and this policy. All users acknowledge that they do not own the software nor its related documentation, and, unless expressly authorized by the software publisher, may not make additional copies except for archival purposes.

Any user illegally reproducing software may be subject to civil and criminal penalties including fines and imprisonment. Users must not illegally copy software under any circumstances.

No user will give software to any outsiders, including clients, customers, and others. Under no circumstances will users use software from any unauthorized source, including, but not limited to, the internet, home, friends, and colleagues.

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Password Policies – Unacceptab le Use

Do not:

Use the same password for personal accounts.

 Share passwords with anyone, including co-workers, supervisors, or administrative assistants. All passwords are to be treated as sensitive, confidential information. If someone demands a password, refer them to this document or have them call the Service Desk.

Note: IT/IS staff may need to change your password for trouble-shooting/issue resolution; in that event you will be provided a temporary password that you will need to change upon completion.

Reveal a password in an email message, over the phone, on questionnaires or security forms, nor talk about a password in front of others.

Hint at the format of a password (e.g., "my favorite song").

Use the "Remember Password" feature that is available in certain applications.

Write passwords down. [removed language] Passwords may be stored electronically with password protected encryption.

Monitoring

Data created on affiliate computer systems remains the property of the affiliate.

Affiliate computer systems and all system data are subject to monitoring, inspection, search, review, access, and disclosure (collectively, "monitoring"). Computer systems and system data may also be monitored at the request of management and with approval from the Versiti Chief of Human Resources or other human resource management.

Returned Computer Equipment

- Upon termination of employment, users must return affiliate devices and computer and communication equipment in their possession (e.g., laptops, smart phones, tablets).
- Upon receipt of affiliate devices and computer equipment returned for repair (e.g., laptops, tablets, etc.), hard drives with local data will be reformatted before the device/equipment is re-issued to another user. In the event equipment is broken beyond repair, the hard drive will be removed and destroyed.
- [reworded] All media collected for disposal or destruction will be stored in an IT/IS controlled access location until properly disposed of by an approved disposal service provider. A written record of all disposed materials will be retained in keeping with record retention policies.

Electronic Signature Policies

This policy applies to all affiliate users who render electronic signatures in affiliate computer programs and systems. This policy does not apply to non-affiliate computer programs and systems.

An electronic signature is a computer-generated symbol or set of symbols used within affiliate computer programs and systems to document the completion of an activity or a series of activities. Users are prompted to enter their electronic signature to confirm the completion and accuracy of activities in order to generate corresponding electronic records.

Electronic signatures used in conjunction with affiliate computer programs or systems are legally binding and equivalent to a user's handwritten signature. In some circumstances, a user's signature may be necessary to ensure that affiliates remain in compliance with regulatory or accreditation requirements. Falsely applying your signature (i.e., documenting the completion of activities that you have not performed) may expose you to enforcement actions by federal or state regulatory bodies and accreditation agencies, as well as disciplinary action within the affiliate, up to and including termination.

In addition, the intentional use of an electronic signature that does not belong to the person constitutes fraud and forgery. A person falsifying an electronic signature may be subject to enforcement actions by federal or state regulatory bodies and accreditation agencies, as well as disciplinary action within affiliate, up to and including termination.

Note: Unless otherwise approved by Versiti Corporate Counsel, electronic signatures are NOT acceptable to approve transactions between affiliates and outside entities (such as written agreements between an affiliate and a vendor or supplier). A handwritten signature, which may be transmitted via scanned image, is required.

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Security Policies

All users will adhere to these security policies in order to protect affiliates and their business partner information system/computer infrastructure when using affiliate provided computer equipment or when accessing affiliate or business partner systems and data with their own device. In addition, under federal law, an affiliate user may be held personally liable for failure to protect sensitive information. Affiliate users are required to follow and comply with applicable laws

Mobile devices are important tools for the organization and their use is supported to achieve business goals. However, they also represent a significant risk to information and data security if the appropriate security applications are not applied and policies are not followed. Any user who intentionally violates these policies and/or accesses data unrelated to their job responsibilities may be subject to disciplinary action.

Behind the scenes, IS/IT employs many security defense technologies and practices, including, but not limited to, encryption, firewalls, spam filters, virus protection, virtual private networks, etc. Working around these protections is a violation of this policy and places Versiti affiliates and business partners at risk for damage to critical systems or release of sensitive or confidential information.

PCs, laptops, workstations, and mobile device security features are not to be modified or deactivated by any user without the consent or instruction of the IT/IS department. Public computers, such as those found at a city library, must not be used to conduct any affiliate business. Affiliate users using a personal computing or mobile device to access email or system information via remote access for business use must have the necessary security application(s) installed.

See Appendix A for specific security applications.

HIPAA Regulations Overview

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) requires that access to Protected Health Information (PHI) is managed to guard the integrity, confidentiality, and availability of both electronic PHI (ePHI) data and non-electronic PHI. According to the law, all "Covered Entity's Name" officers, employees and agents of units within a "Covered / Hybrid" Entity must preserve the integrity and the confidentiality of individually identifiable health information (IIHI) pertaining to each patient or client.

Donor and clinical data may include information that is subject to federal and state HIPAA privacy protections whether this data resides on a stationary or mobile computing device. Users are required to follow acceptable use standards regarding storage, encryption and transmission requirements as defined throughout this policy.

ies

Responsibilit Roles and responsibilities for security are described below.

This title in the HIPAA regulations	Corresponds to this title at Versiti
Information Security Officer	Director, Enterprise Technology Architecture and Security Officer
Chief Information Security Officer	Chief Information Officer

Position	Responsible for
Information Security	Oversight of the computer systems security
Officer	system for Versiti. In addition, the Chief Information Security Officer may assign
	specific management responsibilities to
	appropriate staff members.
IT/IS Security	Training users, reviewing security systems,
Administrator	and logging system use.
(designee)	
Operations staff	Providing and removing user access
	according to detailed guidelines and
	procedures.
Department Managers	Ensuring user training, access authorization, access requests, as well as the security of departmental workstations and PCs.
Trainers	Training users.
Users	Being familiar with and abiding by this policy
	document and related, supporting documents.
Quality personnel	Assessing compliance with regulations as needed.

Security applications used to protect systems and data include password standards, email encryption, and remote wiping. In addition, policies are in place for storage, random verification, etc.:

Password Standards

Passwords are an important aspect of computer security. They are the front line of protection for user accounts. A poorly chosen password may compromise the entire network. As such, all users are responsible for taking the appropriate steps, as outlined here, to select and secure their passwords.

Users who use personal computing devices or personal mobile devices for business use must remain in compliance with current affiliate

requirements regarding password protection. Mobile device screen pattern or pin-based passwords must consist of at least four characters; however, passwords consisting of eight or more characters using strong password practices are recommended.

It is the policy that passwords are personal, not sharable or shared, and are protected with extreme diligence.

All network passwords must be changed every 90 days.

After three failed login attempts, users will be locked from domain and network access until their account is manually reset.

A password must be changed if it has become compromised.

Passwords must not be inserted into email messages or other forms of electronic communication.

All user-level passwords must conform to the requirements described herein.

System-Enforced Password Requirements

Your password must be at least eight characters in length, unless limited by application parameters.

Your password must contain characters from at least three of the following four categories, unless limited by application parameters:

One uppercase letter

One lowercase letter

One digit

One non-alphanumeric character (for example, !, \$, #, or %)

Do not use the following for passwords:

Your username or a word based on personal information, such as names of family, pets, address, social security number, birthdays, etc.

Three or more characters from your account name.

A word found in a dictionary (any language, slang, jargon, etc.) or computer terms and names, commands, sites, company names, hardware. software.

Letter or number sequential patterns, such as aaabbb, 123123123, etc.

If an account or password is suspected to have been compromised, report the incident to the Service Desk and change all your passwords.

Email and Encryption

HIPAA requires that ePHI data being transmitted outside of the affiliate network be encrypted on all affiliate and personal computing devices. A disclaimer is added to each outbound email for legal purposes, and to help protect privacy. It should not be altered in any way. In addition, an affiliate or business partner has the discretion to require that any sensitive or confidential information be encrypted.

Email is a potential source of viruses that usually come from links or are files embedded in attachments. <u>Do not open attachments</u> that are unsolicited, unexpected or emailed by someone you are not familiar with from either an affiliate email account or an email account provided by a third party. Opening such an attachment could potentially lead to a company-wide email outage or damage other systems.

Screen Locking

Screens will automatically lock at 15 minutes or less. Exceptions to this are public screens displaying dashboards or other information.

Texting

Unsecured texting of ePHI or other sensitive information is <u>not</u> acceptable, unless there is a critical or emergent patient or business need. Devices used to text must be password protected, have remote wiping enabled, and encrypted. ePHI must be deidentified and/or encoded, and the sender will inform the recipient he/she is sending ePHI and that the recipient's device should be encrypted.

Remote Wiping

The IT/IS Department will mitigate potential confidentiality incidents due to lost or stolen devices by utilizing a security application to delete or wipe the mobile device. The IT/IS Department may also perform remote wiping of a mobile device under the following conditions:

The device is lost or stolen Termination of employment

Detection of a data or policy incident or virus by the IT/IS Department

Random Verification

User's mobile devices will be made available to IT/IS upon request in order for IT/IS to confirm proper installation and functioning of required security applications.

Storage Policies

[reworded] Whenever possible, all ePHI or company information should be stored on affiliate's network. Personal desktops should not be used for storing documents.

Removable storage devices such as a SD (secure digital) memory card of a mobile device, a USB flash drive (sometimes referred to as a jump drive or a thumb drive) or a laptop hard drive without encryption should not be used for storing ePHI or company information, except where use of a USB flash drive is absolutely necessary and under the conditions described below. Authorization must be obtained from management, with a copy to the Privacy Officer and ServiceDesk (email is sufficient). Upon receipt of this authorization, an encrypted flash drive, provided by IT/IS, must be used. Conditions follow:

- Physicians and others with content containing ePHI, test results, etc.
- Researchers, with content relating to human subjects
- Lab Directors and others, with content relating to patients
- Executives and others with sensitive company information

Use of the encrypted flash drive is logged and users are required to present the device upon IT/IS request. Upon termination, the encrypted USB flash drive must be returned to IT/IS.

Reporting Loss / Discontinue d Use

Each affiliate user using a mobile device for business use must immediately contact his/her immediate supervisor and IS Service Desk in the event the affiliate user is unable to locate his/her mobile device.

If a user decommissions or trades in a mobile device with their cellular phone vendor, he/she must notify his/her immediate supervisor and ServiceDesk immediately so that the IT/IS Department may discontinue corporate data services.

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References

Code of Federal Regulations, Title 45, Part 160 *General Administrative Requirements* and Part 164 *Security and Privacy*. Washington, DC: U.S. Government Printing Office, current edition.

21 CFR Part 11, *Electronic Records; Electronic Signatures*, current edition.

National Institute of Standards and Technology NIST SP 800-66 R1: An Introductory Resource Guide for Implementing the HIPAA Security Rule.

National Institute of Standards and Technology (NIST) Special Publication (SP) 800-30: Guide for Conducting Risk Assessments.

Versiti Privacy Policies & Procedure Manual, February 1, 2015

Document History

Version	Effective	Reason for Creation/Revision
	Date	
1	12/31/2015	Original issue.
2	2/15/2017	Updated to clarify screen locking exception for public screens/dashboards. Updated failed log-in parameters. Updated to specify timeframe for returning equipment for termed employees. Regarding internet acceptable/unacceptable use: a) added requirement that management must request access to a blocked web site; b) added piracy to unacceptable sites; c) added "using mechanisms to mask or hide your identity/location" as unacceptable; and d) stated only company owned laptops may be connected to the Versiti-Secure Internet SSID. Regarding password policies, stated passwords may be stored electronically with password protected encryption. Added clarification that media returned for disposal or destruction will be stored in an IT/IS controlled access location until disposed by approved disposal service provider, with documentation retained in IT/IS. Reworded storage

Version	Effective Date	Reason for Creation/Revision
		policies section for better flow. Removed "tablet" row from Appendix A and added it to "smartphones" row, since security applications are identical.

Appendix A – Security Applications

The following security must be applied when attaching to an affiliate's network:

Device	Security Application			
Affiliate issued devic				
Laptops	 Encryption Password protection Anti-virus software 			
Tablets	Windows – thin client applications • Password protection Windows – thick client applications • Password protection • Encryption	 Android Password protection Wiping functionality (if used for email) iOS Password protection Encryption Wiping functionality (if used for email) 		
smart phones Note: Windows and Blackberry phones are not issued.	iOSPassword protectionEncryptionWiping functionality	AndroidPassword protectionWiping functionality		
Personal devices:				
Laptops and home computers	 User-purchased anti-virus software Access granted only through secure connection (e.g, virtual desktops such as Citrix, VMware, VPN client) or other approved secure connection. 			
Smartphones/tablets Note: [removed "Windows and"] Blackberry phones are not supported.	Android Password protection Wiping functionality Windows Must use OWA (Outlook Web App) for email, calendaring, and contacts	 iOS Password protection Wiping functionality Encryption 		
Removed Tablets row				

COPYRIGHTED AND PROTECTED MATERIAL USE POLICY

SCOPE

This policy applies to the use of graphic images (artwork, illustrations), photographs, audio and musical clips and tracks, and video and film clips that may be added to, or included in, various types of media produced by Michigan Blood staff for both internal and external purposes such as training, information, donor relations, education, and business/professional development.

This policy applies to the use of material in both electronic and tangible (hard-copy) formats.

PRINCIPLES

Copyright laws exist to protect intellectual and creative property from being used without proper regard for the legal rights of the people and organizations that created, performed, or published the work.

Michigan Blood seeks to promote respect for intellectual property and the rights of writers, artists, musicians, photographers, videographers, publishers, and other creative producers to have their work properly respected and valued. To this end, it is the policy of Michigan Blood to comply with copyright laws.

Copyright issues and interpretation of copyright law always have been complex and have become even more so in the age of electronic communication, when computer technology makes it relatively easy to obtain, transmit, and reproduce verbal, visual, and sonic material. Legal penalties for copyright infringement (using without permission, or improperly using, copyrighted material) could represent a significant risk to Michigan Blood.

PROCEDURES

In order to use *any* material – even in very small or brief amounts – without further review, an employee must be able to answer "YES" to at least one of the following questions:

- Is the material from a source which specifies that it is in the public domain? The employee should *not* assume that material found on the Internet is automatically in the public domain.
- Is the material royalty-free? For example, because it was obtained from a source that explicitly described it as "royalty-free".
- Has Michigan Blood paid a royalty or other right-to-use fee for the material?
- Has the creator of the material given written permission for the explicit intended use of the work?

If the answer to all of the above questions is "NO," *or* if the employee is unsure of the answers, the Communications & Marketing Department must review both the material and its intended use. The employee should *not* use the material until he or she has received approval from a representative of the Communications & Marketing Department.

POLICY REGARDING EMPLOYEES WITH DISABILITIES

Michigan Blood is committed to complying with all applicable provisions of the Americans With Disabilities Act ("ADA") and ADA Amendments Act ("ADAAA") of 2009. It is Michigan Blood's policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability so long as the employee can perform the essential functions of the job. Consistent with this policy of nondiscrimination, Michigan Blood will provide reasonable accommodations to a qualified individual with a disability, as defined by the ADA / ADAAA, who has made the company aware of his or her disability, provided that such accommodation does not constitute an undue hardship on Michigan Blood.

Employees with a disability who believe they need an accommodation to perform the essential functions of their job should notify the Human Resources Department in writing of the need for accommodation. Michigan Blood encourages individuals with disabilities to come forward and request reasonable accommodation.

PROCEDURE FOR REQUESTING AN ACCOMODATION

On receipt of an accommodation request, a member of the Human Resources Department will meet with the supervisor and the employee to discuss and identify the precise limitations resulting from the disability and the potential accommodation that Michigan Blood might make to help overcome those limitations.

Michigan Blood may, under certain circumstances, require physical examinations prior to, and during, employment. Such examinations will be used only to determine job related capabilities.

Furthermore, no employee will be discriminated against based on past disabilities resulting from physical or mental condition or the use of illegal or hazardous substances if the employee is currently in an approved rehabilitation program or has successfully completed such a program. Provided that the employee has no present problems, a past history of disability based on such considerations will not prevent employment.

CRIMINAL BACKGROUND CHECKING, CRIMINAL CONVICTION, SUBSTANCE ABUSE AND DRUG TESTING POLICY

PURPOSE

Michigan Blood strives to protect the safety, health, and well-being of all employees and other individuals in our workplace. Michigan Blood considers the abuse of alcohol and drugs to be disruptive and counterproductive, and poses serious risks to safety and health. This policy sets forth guidelines for performing drug testing and criminal background checks subsequent to job offers for Full Time, Part Time, and Casual positions.

CRIMINAL BACKGROUND CHECKING POLICY

Michigan Blood will conduct certain background checks of all candidates who are offered a Full Time, Part Time, or Casual position as a condition for employment. This also applies to those internal candidates currently employed in a different department than the position offered and whose most recent Michigan Blood criminal background check was performed more than two years before the date of the application.

The following information will be verified:

- Social Security Trace
- Criminal Search
- Motor Vehicle Report (if position requires a valid Michigan driver's license)
- Credit Check (if position involves management of funds or handling of cash)

No offer is final until successful completion of a background check with positive notification to the supervisor from Michigan Blood's Human Resources Department.

Any prospective employee that receives a "Not Recommended" result will receive communications consistent with Fair Credit Reporting Act (FCRA) requirements.

FAIR CREDIT REPORTING ACT (FCRA) COMPLIANCE

The FCRA regulations are intended to give an employee the opportunity to correct any factual error in the report before an adverse employment action is taken. The employee will be given five calendar days to respond to the report before final employment action is taken. If, after examining the background information report and the candidate's response, Michigan Blood's management believes that an individual is not appropriate for employment, the candidate will be informed.

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CRIMINAL CONVICTION POLICY

Any employee who is convicted of any felony must report such conviction in writing to their supervisor and the Director of Human Resources within five (5) days of the conviction. If, at the sole discretion of Michigan Blood, the conviction is deemed job-related, the employee may be subject to disciplinary action, up to and including termination of employment.

SUBSTANCE ABUSE POLICY

Michigan Blood prohibits the use of illegal drugs during work hours. Use, possession, sale, offer to sell, transfer, offering, furnishing of Drugs, or the possession of implements or paraphernalia for Drug use, in any company facility or in the workplace, or during the employee's working hours/shift, is prohibited. No employee shall report for work, return to work, be at or remain at work or be unable to safely perform their job in any company facility, work site, vehicle, or during the employee's working hours/shift with the presence of any detectable amount of any Drug in any employee's system (indicating the individual is or has actively engaged in Drug use). This does not apply to proper use of a prescription drug (see below).

Use, possession, sale, offer to sell, transfer, offering or furnishing alcohol in any Michigan Blood facility or in the workplace, or during the employee's working hours/shift, is also prohibited. No employee shall report for work, return to work, be at or remain at work or be unable to safely perform their job in any company facility, work site, vehicle, or during the employee's working hours/shift while appearing, being under the influence of, or impaired by, alcohol as determined by the employee's supervisor or designee.

Reasonable use is not prohibited at Company-sponsored social events that include the service of alcoholic beverages.

An employee violating this policy is subject to corrective action up to and including termination.

EXCEPTION FOR PRESCRIPTION DRUGS

Prescription drugs taken under the supervision of a licensed health-care professional may be used by an employee, provided:

- the drug has been prescribed by a licensed health professional for the employee using it, and
- the drug is used by that employee at the dosage recommended or prescribed.

The employee must notify the supervisor if the use of properly-prescribed prescription drugs will affect the employee's work performance. Improper use of prescription drugs will not be tolerated.

An employee taking a prescription drug or other medication (e.g., over-the-counter drug) who reports to work, returns to work, remains at work, or who is observed to be incapable of safely performing his/her job as determined by his supervisor or designee, or whose job performance is adversely affected by a drug may, depending on the circumstances, be subject to disciplinary action up to and including termination of employment.

If, in the opinion of the supervisor, the employee is considered unfit to work for any reason the employee will not be allowed to work.

TESTING

Pre-Employment / Transfer

Michigan Blood will conduct pre-employment screening examinations designed to prevent hiring individuals who use illegal drugs or individuals whose use of legal drugs indicates a potential for impaired or unsafe job performance.

All candidates who are offered a Full Time, Part Time, or Casual position will undergo screening for the presence of illegal drugs or alcohol as a condition for employment. This also applies to those internal candidates currently employed in a different department than the offered position and whose most recent 10-panel drug screen was performed for Michigan Blood more than two years before the date of the application.

These candidates will be required to submit to a urinalysis test at a laboratory chosen by the company and, by signing a consent agreement, will release the company from liability. Refusal to sign this form or refusal to give consent for testing will be grounds for immediate termination of employment or disqualification for employment consideration.

Anyone who contaminates or attempts to contaminate specimens collected for testing purposes or who otherwise interferes with the Company's testing procedures will be terminated immediately.

A positive pre-employment drug test will result in the employment offer being rescinded. Any Michigan Blood applicant who tests positive must wait a period of twelve (12) months prior to re-applying for employment with the company and will be subject to another drug test upon receipt of a subsequent employment offer.

An NIDA-certified (National Institute on Drug Abuse) Medical Review Officer will review all drug tests. All positive drug tests for both applicants and current employees will receive an additional confirmation test performed on the same specimen from the initial collection.

Anyone who tests positive for the presence of a controlled substance will be contacted by the Medical Review Officer (MRO). The applicant/employee will be allowed to explain and present medical documentation to explain any permissible use of the drug. All such discussions will be confidential.

Employees who have received firm employment offers are cautioned against giving notice at their current place of employment, or incurring any costs associated with accepting Michigan Blood employment until after medical clearance has been received.

Testing Required by the Department of Transportation

Michigan Blood complies with the requirements for drug and alcohol testing mandated by the Federal Motor Carrier Safety Administration/US Department of Transportation (FMCSA/DOT). These requirements apply to blood bus operators.

Pre-employment

Blood bus drivers are required to undergo Michigan Blood's pre-employment drug and alcohol screening. Under no circumstances may a blood bus driver operate the blood bus until a confirmed negative result is received. Blood bus driver drug testing shall follow the collection, chain-of-custody and reporting procedures as set forth in 49 CFR, Part 40.

Post Accident

All blood bus drivers are required to provide a breath test and a urine specimen to be tested for the use of controlled substances "as soon as practicable" after an accident.

Random

Employees who operate the blood buses will be subject to unannounced random drug testing per FMCSA regulations. Michigan Blood bus drivers participate in a consortium for random drug testing purposes. The testing will be conducted in accordance with rates set annually by FMCSA.

Reasonable Suspicion

In situations where a blood bus driver's supervisor or another member of management has reasonable suspicion to believe that an employee possesses or is under the influence of drugs and/or alcohol, Michigan Blood reserves the right to test the employee for drugs and/or alcohol. Reasonable suspicion exists

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when an employee displays such behavior as, but not limited to: the odor of alcohol or marijuana, unsteady gait, slurred speech, glassy-eyes, staggering, on the job accidents, excessive absenteeism and/or arguments with customers or co-workers.

Return to Duty Testing

Before a blood bus driver returns to duty requiring the operation of the blood bus, after engaging in conduct prohibited by this policy, the driver must pass applicable drug or alcohol tests.

SUBSTANCE ABUSE TREATMENT / EMPLOYEE ASSISTANCE

Michigan Blood attempts to provide employees the opportunity to deal with drug and alcohol related problems. Michigan Blood recognizes that alcoholism and/or drug dependency are generally regarded as medical problems requiring close medical supervision and treatment if there is to be successful rehabilitation. Michigan Blood encourages any employee who feels he or she may have an alcohol or drug dependency problem to voluntarily seek professional help before job performance is affected.

Professional counseling and treatment programs for drug and/or alcohol use may be available through Michigan Blood health insurance or other programs. An employee who seeks approved rehabilitation will be treated by Michigan Blood in the same manner as an employee with other medical problems.

However, where a violation of this policy has occurred, Michigan Blood has the right to follow Guidance and Correction Procedures which are appropriate for a policy violation, up to and including termination of employment.

Professional counseling and treatment programs for drug and/or alcohol use may be offered as part of the guidance and correction process. Any cost not covered by Michigan Blood is the employee's responsibility.

Participation in a treatment or rehabilitation program does not guarantee continued employment. Employment at Michigan Blood is "at-will" and may be affected by management's assessment of performance, conduct, or other factors. Likewise, participation in a treatment or rehabilitation program does not prevent corrective action for violation of this policy or violation of any other Michigan Blood policy, standard of conduct, behavioral or performance expectation.

STANDARDS OF CONDUCT POLICY

Michigan Blood's employees must be interested, friendly, understanding and professional when dealing with or attending donors, patients, visitors and other staff. Staff must be dedicated to providing the highest level of service to our donors, our hospitals and fellow employees. Employees seek to continually improve our blood services, processes and operations.

Staff are expected to:

- observe the highest standard of professional integrity;
- treat coworkers with respect, courtesy, fairness, and honesty;
- exercise professional discretion and impartial judgment when performing any functions or duties relating to donors, staff, or Michigan Blood;
- treat donors with tact and courtesy, showing understanding of their problems, carefully explaining our concern for them and their good health.

No staff member shall participate in, condone, or be involved with theft, dishonesty, fraud, deceit or misrepresentation.

The soliciting of information or using information that is obtained while in the course of Michigan Blood business for personal favors or gains is prohibited.

The nature of the services offered by Michigan Blood makes it necessary for employees to be flexible in their hours and availability for work and to maintain strict donor confidentiality. Each individual is expected to become and remain proficient in the performance of his/her assigned duties, without going outside the scope of his or her training and/or supervisor's instructions.

Each staff member shall accept the ultimate responsibility for the work performed and service rendered. Staff shall function as a team, uniting together toward the Michigan Blood mission of providing remarkable service and quality products to the donors and patients in the communities we serve.

NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

Michigan Blood is committed to equal employment opportunity in all of its employment practices. Members of Michigan Blood management recruit, employ, train, promote, and discipline employees solely on the basis of individual qualifications and performance, and as is feasible under the standards and policies outlined in this handbook and related policies.

Decisions involving every aspect of the employment relationship are made without regard to an employee's race, color, creed, religion, sex, age, national origin, marital status, veteran status, or any other status or characteristic protected under applicable state or federal law, unless it is a bona fide occupational requirement necessary to the normal operation of the business. Discrimination or harassment based on any of these factors is inconsistent with our philosophy and will not be tolerated at any time.

It is the intention of the Michigan Blood to recognize the right of every employee to work in an environment free of prohibited harassment. Michigan Blood will not tolerate inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment. Examples of inappropriate behavior include, but are not limited to, slandering, ridiculing, name calling which is hurtful, insulting or humiliating; using a person as butt of jokes; abusive and offensive remarks; spreading rumors and gossip regarding others; insulting others and use of offensive nicknames.

Michigan Blood prohibits any unwanted physical, verbal, or visual sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature which constitutes sexual harassment. Ethnic harassment includes the use of inappropriate ethnic references in daily speech or actions, ethnic name calling and ethnic jokes. Every employee should work in an environment totally free of sexual, racial or ethnic harassment, including, but not limited to the use of derogatory or suggestive comments, slurs or gestures and offensive posters, cartoons or drawings. Such conduct does not advance the purposes of Michigan Blood and interferes with the working environment of fellow employees.

Any person who, during his or her employment at Michigan Blood, is subject to harassment or other offensive behavior, or is exposed to such conduct has the right to have such activity terminated immediately. Complaints can be made to the employee's immediate supervisor. If for some reason an employee feels that he or she cannot report the harassment to the immediate supervisor, the employee can report it to Human Resources or any other member of management.

Whether or not certain conduct constitutes sexual or ethnic harassment may depend upon how that conduct is viewed by the employee who is subject to that conduct. The employee who initiates or persists in the unwelcome and offensive conduct assumes the risk and possible penalties associated therewith, in the event that reasonable people view the conduct as offensive, even if it might not have been intended as offensive.

When complaints of sexual or ethnic harassment are brought to the appropriate personnel, an investigation shall be made concerning the allegations. Michigan Blood will evaluate the conduct in question, including the nature of the harassment and the context in which the alleged incidents occur. Each incident will be reviewed on a case by case basis. As appropriate, corrective action will be taken. Those found violating this policy, after a thorough investigation of charges, will be subject to appropriate discipline as detailed in Section 15 – Progressive Guidance Policy.

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CONFIDENTIALITY AND NON-SOLICITATION POLICY

CONFIDENTIALITY

Michigan Blood depends on volunteer donors to provide blood and blood components for the patients in the communities we serve. It is our responsibility to keep all information regarding the donor and his/her donation in the strictest confidence. This includes but is not limited to donor identity, medical history, blood typing, interview, physical examination and lab test results.

All records, papers, information, documents, and software to which any employee may have access in the course of his/her employment are also considered confidential by Michigan Blood and must be treated as strictly confidential by all employees during and after their employment ends. All such records, papers, information, documents and software will remain Michigan Blood property during and after employment of any employee and must be returned upon termination.

Employees will not be permitted, either directly or indirectly, under any circumstances or at any time, to disclose to any person, firm, association or corporation any confidential information acquired in the course of employment with Michigan Blood. Any or all information relating to: ideas, concepts, discoveries, improvements, devices, processes, products, computer programs, customer lists, prospect lists, marketing and sales strategies, pricing lists, and/or any other information gained by the employee during the term of employment, or received from third parties by Michigan Blood, are included within the scope of this restriction.

Employees may not involve donors, patients, and/or their families in the personal matters of staff, donors or patients; nor involve others inappropriately in the internal business of Michigan Blood.

NON-SOLICITATION AND NON-DISTRIBUTION

In service to donors, clients, and each other:

- Solicitation by an employee of a fellow employee during the working time of
 either employee, on behalf of any individual, organization, employee, club or
 cause, is not permitted. "Working time" does not include an employee's
 scheduled break or lunch period, or just before or after a work shift.
- Distribution of any literature, pamphlet or other material to an employee during the working time of either employee, or at any time in any working area is not permitted.
- Company bulletin boards should be used only for notices about Michigan Blood information and activities. Only authorized notices or bulletins are permitted to be posted.

Unauthorized entry, solicitation, or distribution of materials on Michigan Blood property by individuals other than employees is strictly prohibited. Any employee who observes any questionable or unauthorized solicitation or distribution taking place on company property should notify a member of management.

Note: The above prohibitions do not apply to charitable solicitations or postings expressly authorized by Michigan Blood from time to time in keeping with its corporate values and belief in good citizenship.

CONFLICT OF INTEREST

Michigan Blood developed the Conflict of Interest Policy to protect those involved in the business operations of the company and in their relationship with each other. Annually, all members of management will be sent a copy of the policy. The policy requires management staff to read the policy material and to comply with the request within the appropriate timeframe.

Michigan Blood is a not-for-profit corporation entrusted by the communities it services to meet their blood supply needs. Michigan Blood staff are in positions of trust and the Conflict of Interest Policy was written so that each of us can state, for the record, anything that might be construed as a possible conflict. If any doubt exists as to a possible conflict, it is to be written down and the CEO and appropriate members of leadership will use the information to determine if possible conflicts exist or could exist.

WHISTLEBLOWER POLICY

POLICY

Michigan Blood requires Board members, volunteers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Staff are encouraged to come forward with credible information about fraudulent or illegal practices. Whistleblowers are protected from retaliation for making good faith complaints.

REPORTABLE ACTS

Activities that should be reported under this policy include, but are not limited to:

- Financial malpractice, false/misleading financial reporting, impropriety or fraud
- Providing false information to or withholding material information from Michigan Blood auditors, Board of Directors, or management
- Violations of the Conflict of Interest Policy
- Failure to comply with a legal obligation or statute
- Criminal activity
- Theft or misappropriation of money or company assets
- Billing for services not performed or for goods not delivered
- Illegal conduct or unethical behavior that are violations of federal, state, or local laws
- Attempts to conceal any of the above

REPORTING RESPONSIBILITY

It is the responsibility of all staff to report violations in accordance with this Whistleblower Policy.

NO RETALIATION

Michigan Blood will not discipline, discriminate or retaliate against any board member, volunteer, or employee who reports such conduct in good faith, whether or not such information is ultimately proven to be correct, or who cooperates in any investigation or inquiry regarding such conduct.

An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to

raise serious concerns within Michigan Blood prior to seeking resolution outside the organization.

The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that may be found as a result of any investigation.

REPORTING PROCESS

Reports should describe in detail the specific facts demonstrating the basis for the concern. Employees may contact his/her immediate supervisor, Human Resources Department staff, or any appropriate management staff. Michigan Blood management are required to report suspected violations exclusively to either the Director of Finance, Director of Human Resources, or CEO/President. If the complaint involves the CEO/President, it should be directed to the Chairman of the Michigan Blood Board of Directors.

Michigan Blood will conduct a prompt, discreet, and objective review or investigation. Results of the investigation will be sent to the appropriate reviewing body, usually either the CEO/President or appropriate Board committee.

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Director of Finance or Director of Human Resources, as the situation warrants, shall immediately notify the Finance Committee of any such complaint and work with the Committee until the matter is resolved.

ACTING IN GOOD FAITH

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

CONFIDENTIALITY

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Staff must recognize that Michigan Blood may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

PROFESSIONAL APPEARANCE POLICY

Michigan Blood is an integral part of the healthcare profession, and, as such, employees should project an image and appearance to donors, clients, and the general public that creates confidence and trust in our services. All employees share the responsibility to meet the guidelines in this policy. Additional standards may be set by certain divisions or departments that are relevant to the work in that area.

All guidelines are set in consideration of:

- the employee's and others' safety, and
- image projected to donors, clients, other members of the public, and each other

GENERAL GUIDELINES:

- 1. Employees must present a neat, clean, and well-groomed appearance.
- Employees must wear Michigan Blood ID Badges above the waist in clear view of other staff, visitors, and donors at all times while working. The badge must be free from obscuring ornamentation and the photograph must be clearly visible. Any lanyards or other badge holders should be work-appropriate.
- 3. As described in Michigan Blood's Exposure Control Plan, staff must wear protective clothing when their work may put them in contact with blood or hazardous materials. As an example, open-toed shoes may not be worn in a bio-hazardous area; however, shoe covers may be utilized. Required protective clothing, such as lab coats, gloves, or face shields, will be provided by Michigan Blood.
- 4. All Michigan Blood staff should exhibit high standards of personal grooming and hygiene, and wear attire that is clean and free from excessive wear and tear. Jewelry and make-up, if worn, should be in good taste and moderation.
- Perfume, cologne, body sprays, offensive body odor, and cigarette or other smoking odors are not permitted due to sensitivity (allergies, illness) of fellow employees and donors.
- 6. Unless otherwise specified, business casual attire is appropriate in most circumstances. Business casual is crisp, neat, and should look appropriate even for a chance meeting with an external customer. This style of clothing offers general comfort and yet maintains a professional appearance. Refer to specifics provided at the end of this policy.

- 7. Management may specify additional appearance requirements based on the business needs and safety requirements of their departments. For instance:
 - Certain departments may require uniforms, scrubs, or lab coats.
 - Certain departments may allow more relaxed dress for special events, activities, holidays such as Halloween, or occasions such as allowing staff to wear jeans on "6S" days.
- 8. Overly casual dress is inappropriate at any time, for example:
 - Shorts, denim overalls, coveralls
 - Rubber flip flops
 - Tight fitting, excessively revealing, or provocative clothing including strapless tops, halter or spaghetti strap tops without outer cover, bare midriff, low cut tops, or excessively short skirts or dresses (less than fingertip length when standing)
 - Jogging suits, sweat suits, or yoga pants
- 9. Footwear should be appropriate for the requirements of the job, clean, and in good repair.
- 10. Body piercing, gauging, and body art such as tattoos are a personal choice but while at work should be inconspicuous. Management reserves the right to ask an employee to remove or cover anything that is deemed to be inappropriate for viewing by customers and other employees.
- 11. Insignia that could distract and potentially disrupt the workplace and offend donors, visitors, clients, and colleagues including volunteers are prohibited. This includes wearing political stickers or campaign buttons of any kind.

Management is responsible for interpreting and enforcing the Professional Appearance Policy, and has ultimate discretion to determine the impact of professional appearance issues.

Reasonable accommodations should be made for dress or grooming directly related to an employee's religion, ethnicity, or disabilities.

Allowance may also be made for staff responding to an unplanned work situation or weekend work outside of customer interaction.

Employees in need of additional information about what attire is appropriate should bring their questions to their upline in advance of wearing it to work.

Failure to adhere to the above policy may result in progressive guidance. Employees will be counseled when their attire does not meet the professional appearance guidelines. If management determines that the employee should be sent home to change, the time that he or she is away from work will be unpaid.

Employees must always remember that appearance to current and prospective donors, other staff members and visitors reflects the image of Michigan Blood.

Helpful Examples

Listed below is a general overview of business casual wear, which is intended to help us set parameters for appropriate dress. **These lists are not all inclusive.**

Business Casual

What to Wear	What Not to Wear
 Properly fitting slacks Coordinating, unwrinkled tops Sweaters, vests, mixed separates Capris or culottes Comfortable, clean and polished shoes Casual, coordinated accessories Michigan Blood polo shirts 	 Clothing that is ripped (from wear or design), dirty, missing buttons, wrinkled or ill-fitting Tight or revealing clothing, such as halter tops, backless tops, tank tops, bare midriff, or crop tops Jeans Jogging pants or fitness wear Shorts Flip-flops

PROGRESSIVE GUIDANCE POLICY

The intent of these procedures is to ensure, through progressive steps, that employees are informed of performance expectations, breaches of rules or policies, and, as appropriate, they are given an opportunity to correct deficiencies. Michigan Blood's progressive guidance policy does not limit Michigan Blood's right or an employee's right to terminate employment at will for any reason or for no reason.

Michigan Blood reserves the exclusive right to determine what level of action is appropriate at any time, and involuntary termination can occur with or without regard to progressive levels of discipline which have already been instituted. The levels described are not all-inclusive, and Michigan Blood's right to institute guidance procedures is not limited in any way, except where in violation of any law or regulation.

Michigan Blood's progressive guidance procedure has four levels of action:

- 1. **Counseling** A supervisor counsels the employee and documents the meeting in the employee's departmental performance records.
- 2. **Written Warning** Used for repeat offenses, or when the nature of the offense or the employee's past record requires a more serious action. The written warning is documented on an Employee Guidance Report and filed in the employee's personnel file.
- 3. Final Warning/Suspension Used for repeat offenses, or when the nature of the offense or the employee's past record requires a more serious action. The suspension, one to three days unpaid leave, must normally be approved by Human Resources prior to taking effect. It is documented on an Employee Guidance Report and filed in the employee's personnel file.
- 4. **Discharge/Termination** The degree of action taken will be appropriate to the seriousness of the offense and the employment record of the employee who committed the offense, except when management deems it appropriate to exercise the at-will relationship and discharge the employee. All discharge decisions must be approved by Human Resources. They must be documented on the Employee Guidance Report and filed in the employee's personnel file.

All Written Warnings, Suspensions, and Discharges will be discussed with the employee in the presence of an appropriate third party. The employee will be given an opportunity to remark both orally and in writing and will be given a copy of the Employee Guidance Report and supervisor's comments. The employee will be asked to sign the Employee Guidance Report attesting solely to their receipt of the document and attendance at the discussion.

PROBLEM RESOLUTION

Employee remarks should be presented within seven days of the discussion. As part of the employee's remarks, he/she may present information that may challenge information management has used to issue the Guidance. The purpose of this dialogue is to provide insight into any extenuating circumstances that may have contributed to the employee performance and/or conduct issues while allowing for an equitable solution. Should an employee strongly disagree with the action taken, he or she may request that Human Resources review the supporting facts and the appropriateness of the action.

FAIR TREATMENT POLICY

Michigan Blood intends to provide a fair and effective way for employees to bring to management their questions, concerns, and problems related to appropriate, consistent administration of Michigan Blood policies. The following process has been established for the benefit and use of employees.

When an employee disagrees with a decision about the administration of a policy or practice, he/she is encouraged to discuss their concerns with management and/or Human Resources. No employee will be penalized for voicing a complaint in a reasonable, professional manner or for utilizing these procedures.

If a situation occurs in which an employee perceives that policy decision affecting them has been incorrectly applied, he/she is encouraged to make use of the following steps to bring the issue to management's attention. An employee may choose to discontinue the process at any time.

Discussion of the problem with the immediate supervisor is encouraged as a first step, ideally within five normal business days of the occurrence. If the immediate supervisor is unavailable or if the employee believes a discussion with the supervisor is inappropriate, the employee is then encouraged to present the problem to the next successive management staff.

The immediate supervisor should respond to the problem within five normal business days. Consulting with appropriate management may be necessary. If satisfactory resolution is not achieved at the department level, the problem is then presented by the employee to the next successive management staff within five normal business days. That next-level member of management should respond to the problem within five normal business days.

If the solution at this stage is unsatisfactory, the employee may then bring the problem to Human Resources within five normal business days. Human Resources will determine appropriate action within five normal business days. If the solution remains unsatisfactory to the employee, the employee may present the problem to the Vice President of his/her division within five normal business days.

The decision of the Vice President will be made within five normal business days and that decision is the final step in this process.

In the event the Chief Executive Officer is the subject of the grievance, the Michigan Blood Board of Directors should be notified through the Chairman of the Board or the Human Resources Department.

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CHARITABLE CONTRIBUTIONS AND SOLICITATION POLICY

Michigan Blood encourages all employees to have a positive impact on our communities (MB Strategic Priorities 2017-2019). However, as a nonprofit, Michigan Blood has limited resources for giving back to our community, so as good stewards we want to be sure our resources are used wisely, provide reasonable return for our investment and best meet the vision and mission of Michigan Blood.

Areas of Support

Michigan Blood and its employees will strive to effectively represent Michigan Blood within the community, among hospital partners and with potential hospital partners. The primary focus of our support will be for health-related organizations and causes. Contributions will be coordinated with employee volunteer activities when possible to achieve maximum impact within budget guidelines. When appropriate, we will:

- Partner with community organizations, hospital partners or others as appropriate for presence at high profile events that create brand awareness, offer educational and informational opportunities, and provide links to potential sponsors (e.g., Gilda's Club LaughFest, Cherry Festival, Light the Night)
- Identify and support high impact community engagement opportunities to promote Michigan Blood and give back to communities we serve (ex: event sponsorship tied to blood drive, hospital partners' Foundations and events)
- Develop corporate social responsibility and public-private partnerships with organizations statewide to connect Michigan Blood's message with responsive, engaged audiences (ex: Gilda's Club, Cancer Centers, Lymphoma/Leukemia Society, National Sickle Cell Disease Association, Veterans organizations, etc.)

Exclusions

- Requests from all local, regional, and/or school-based sports teams, or for PTO's, graduation events, yearbook publication or other school program advertising will not be considered. f
- Requests for financial support for individuals, political candidates, and political campaigns, or entities that are not nonprofit organizations will not be considered. Contributions will not be made to organizations conducting fundraising (third party giving) on behalf of nonprofit agencies. *f*

Policy

In service to donors, clients and each other:

- Solicitation by an employee of a fellow employee during the working time of
 either employee on behalf of any individual, organization, employee, club or
 cause is not permitted. Working time does not include an employee's scheduled
 break or lunch period, or just before or after a work shift.
- Staff and Management Connections newsletters may not be used to ask for employee support of or participation in causes unless it is a system-wide approved Michigan Blood project (e.g., Be the Match Fore for Life basket auction). Michigan Blood email may not

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be used to recruit volunteer support from across the organization other than Michigan Blood cause based events.

- Distribution of any literature, pamphlet or other material to an employee during the working time of either employee or at any time in any working area is not permitted.
- Michigan Blood bulletin boards may only be used for notices about Michigan Blood information and activities. Only authorized notices or bulletins may be posted.

The above restrictions may be waived for charitable solicitations or activities that align with Michigan Blood's mission, values and belief in good citizenship.

Exceptions

Only Michigan-based, 501(c)(3) nonprofit organizations and 501(c)(4) social welfare organizations will be considered for charitable contributions, sponsorships, volunteer support, or in-kind donations. All Michigan Blood charitable contributions, sponsorships, and in-kind services will promote our mission, business goals, create positive visibility, and demonstrate social responsibility. f

Michigan Blood may consider requests to support social, community, civic, educational, diversity, and economic endeavors if these align with Michigan Blood's strategic plans and goals, contribute to our growth and success, and/or if Michigan Blood employees are involved in the governance of the organization. *f*

Process

All requests for charitable contributions, sponsorships, cause-based drive donations, in-kind services or support, and/or volunteer support by employees will be coordinated and administered by the Michigan Blood Leadership Team and implemented with the support of Community Relations and Marketing. Individual employees may not respond to requests from (or solicit from) individuals or organizations that have an actual or potential business relationship with Michigan Blood.

Requests must be submitted in writing to the Manager of Community Relations and Marketing for review and must be approved by the Leadership Team prior to distribution or posting. Community Relations will communicate directly with agencies or employees regarding all requests and coordinate any follow up documentation, and/or collateral activities such as banners, giveaways, materials etc.

Community Service Projects

Michigan Blood encourages employee participation in community service activities, but asks that employees use discretion. Please do not actively recruit across the organization (unless Michigan Blood is a primary sponsor). Employees or departments in each region may elect to support a community- based activity that is of regional importance (e.g., book drive, winter coat collections for those in need, school lunch

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programs). Internal newsletters may be used to thank and recognize participants or report out on success after an activity or event has been completed. Please notify Community Relations about any regionally-based employee engagement activities.

It is our goal through this policy to provide balance between all community and employee requests for support. We hope this policy helps balance community and employee need with resources available to Michigan Blood. For questions about this policy, contact the Manager of Community Relations and Marketing.

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SOCIAL MEDIA POLICY

Social media, including professional networking sites, social networking sites, blogs, and personal websites can be very useful technologies for communicating and connecting with others, both personally and professionally. Michigan Blood respects the right of its employees to interact on social media and recognizes that employees may want to share their experience with Michigan Blood with others. Employees who choose to use social media sites or who comment on blogs or other online media should always be aware that they represent Michigan Blood and should observe the highest standard of professional integrity and treat coworkers with respect, courtesy, fairness, and honesty. Your online activities should demonstrate the use of good judgment by avoiding material that is detrimental to the reputation of yourself, your coworkers, and Michigan Blood.

Exercise professional discretion and impartial judgment when using social media. Before you publish, upload or disseminate any information related your employment, you should consider carefully whether such disclosure is prohibited by this or any other Michigan Blood policy. Your posts on social media must also comply with confidentiality obligations imposed by law, including HIPAA.

If you choose to participate in social media discussions about Michigan Blood, donors, or sponsors, you should disclose your employment with Michigan Blood, and you should make it clear that the views expressed are your own and not those of Michigan Blood, its representatives or any affiliates. If you share your opinions publicly in social media forums, you are legally responsible for your comments and you may be held personally liable for anything you write or post online.

The Michigan Blood social media platforms (website, Facebook, Twitter, YouTube, Instagram, LinkedIn, Pinterest, etc.) are produced and managed by the Michigan Blood Communications Department. If Michigan Blood approves or sponsors any social media, only employees designated or authorized by the Manager of Community Relations and Marketing may prepare content for, delete, edit or otherwise modify content on such approved social media. You are not authorized to speak on behalf of Michigan Blood or represent that you do without the permission of Community Relations.

Communications and posting which contain any of the following are prohibited:

- Misrepresentation of facts;
- Messages containing expletives or their abbreviated forms;
- Messages construed as harassing, offensive or discriminatory;
- Messages containing libelous, defamatory, offensive, racist, or obscene remarks;
- Derogatory comments about Michigan Blood, management, fellow employees, mobile drive groups or their representatives, volunteers, vendors, clients, or potential clients;
- Messages containing confidential information, which includes but is not limited to financial information, business relationships, patient and donor information

Michigan Blood may monitor comments or discussions that are posted electronically to social media sites and you may be asked to remove or modify any content that is considered to be in violation of this policy or any Michigan Blood policy.

The use of social media while on work time or on equipment we provide is prohibited, unless it is work-related as authorized by your supervisor. Do not use Michigan Blood email addresses to register on social networks, blogs or other online tools utilized for personal use.

You should carefully read and adhere to these policies; non-discrimination, non-retaliation and anti-harassment policy, ethics policy and computer use policy to ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

COMPENSATION

An employee's salary or pay rate at hire depends on the position accepted and is based primarily on ability, education, and work experience. Once hired, an employee's pay will progress based primarily on work performance and market factors. The salaries and pay rates of positions at Michigan Blood are reviewed periodically by management and Human Resources.

A pay period extends for two weeks beginning on every other Sunday morning. There are typically 26 pay periods each year. All paychecks are normally available by 5:00pm on the Friday following the end of each pay period. Each paycheck includes a statement of earnings and deductions.

The employee is responsible for verifying the accuracy of all information on each paycheck (i.e., the wage, the hours, etc.) Any questions regarding paychecks should be directed to the supervisor or, as necessary, to the Human Resources department.

HOURS OF WORK AND ATTENDANCE

Regular attendance and punctuality is an essential expectation of every employee's job. This is the foundation for a safe, productive, and efficient work force that is able to meet our various customers' needs. Each employee is responsible to be on time and present when scheduled to work.

All employees are considered 'non-exempt' and eligible for overtime as regulated by the Fair Labor Standards Act (FLSA), unless specifically designated as 'exempt' by Michigan Blood.

Due to the nature of Michigan Blood's work, it may be necessary for a supervisor to schedule an employee to work overtime. Overtime is paid for hours worked in excess of forty (40) hours in a work week. Overtime, when paid, after approval of one's supervisor, will be paid at the rate of one and one half times the regular rate. Exempt employees receive fixed pay for fluctuating hours and are not subject to this provision.

Each employee will keep track of his/her work hours by either punching in and out in the timekeeping system or completing a timesheet. No employee may punch in or out for another employee nor falsify his or her own time record.

Time records must be approved by the supervisor and all paid hours, including overtime and early exit, must be approved by the supervisor.

An unpaid meal period of up to one-half hour may be granted to all employees who are scheduled to work in excess of six hours on a working shift.

Employees are permitted, subject to work flow and approval, one 15 minute paid rest period for each four hours worked, as scheduled by the supervisor or designee. Meal and rest periods should be arranged and approved so that each department is continuously covered.

If a non-exempt employee leaves the building and/or work site for personal business, other then designated lunch break, he or she must punch in and out. The supervisor or designee must be notified and in some cases will need to approve, in advance, all exits from the work site/building during an assigned work shift.

The work day begins when the employee reports to his/her work station, at his/her scheduled time to begin work. Time records should reflect when they arrive or leave the work station, not when entering or exiting the building.

Working hours are scheduled by the supervisor to meet Michigan Blood's needs. The operational needs of some positions allow for more flexibility than others. The supervisor should clarify the acceptable degree of schedule flexibility. Failure to adhere to schedule arrangements without advance approval of the supervisor or designee may result in progressive guidance.

When unable to work, the employee must notify his/her supervisor with as much prior notification as possible given the circumstances.

If the absence continues beyond the first day, the employee must provide daily notification until return to work, unless other communication arrangements have been specifically approved by the supervisor.

When possible, advance notice of tardiness must also be given to the supervisor.

The supervisor will designate requests as approved or not approved and absences as scheduled or unscheduled on the Time Off Request Form.

Definitions

Attendance – is defined as arriving and departing as scheduled for your work shift and following established break time and meal periods. This includes being present, ready and able to work at the scheduled start time and completing the shift through the scheduled end time, unless directed otherwise.

Scheduled absence – Absence, regardless of cause, of at least two hours that occurs with a minimum of 48 hours prior approval.

Unscheduled Absence –Absence, regardless of cause, of at least two hours on a scheduled work day that occurs without 48 hours prior approval. Consecutive days off will be considered one unscheduled absence.

Extended Time Away – Employees who are absent from work for one calendar week or at least five (5) consecutive scheduled work days due to injury or illness will be required to provide a return to work slip from their health care provider. This provision shall be applied in a manner that is consistent with all applicable federal, state, and/or local laws.

Missed Punches – Missed punches are defined as an employee not using the authorized methods to clock in or out for their worked hours or meal periods. At the discretion of management, mis-punches may be excused otherwise considered a tardy.

Pattern of Absence - When an employee is absent from work in a noticeable pattern. (E.g. Monday, Fridays, weekends, around holidays, paydays, etc.) Patterns of Absence or tardiness, even though not in excess of the defined attendance guidelines, may subject the employee to progressive guidance.

 An unreliable attendance pattern is a concern when absences or tardiness occur on a regular, repeated or consistent basis and begin to affect department operations (e.g. scheduling, ability to meet donor/patient demands, etc.) **No Call / No Show** – Absence of at least one full shift without any notification to supervisor or designee. Three consecutive No Call / No Shows are considered voluntary resignation.

Tardy – Presenting to work station greater than ten minutes after scheduled start time. Tardy may be defined more restrictively at Departmental level for operational reasons subject to Director Approval, but no less than four minutes variance.

Other Shift Variance – Clocking in more than ten minutes ahead of the designated shift start time or clocking out more than ten minutes after the designated end time. If an employee works a partial shift and supervisor sends employee home, i.e. lack of work, illness, overstaffed, etc., count as a scheduled absences.

Responsibilities:

Employees:

- All employees are expected to be at their assigned work location at their scheduled start time ready to work. Employees are responsible for managing their lives so as to meet this expectation.
- All employees are expected to keep track of their work hours by using the timekeeping system and follow timekeeping procedures.
- Consult with Manager and/or Human Resource, if absence from work may be related to a Leave of Absence or the Family Medical Leave Act
- If employee is not able to return to work the following day after being absent, the employee must follow up with their manager/supervisor directly as soon as possible and provide an update on the status of their absence.
- Employee must notify the Supervisor, Manager, or Designee at least two (2) hours prior to the start of each scheduled shift, if unable to report to work as scheduled.
 - Speak directly to the appropriate Designee according to department procedures.
 - Provide general reason for absence or tardiness and indicate expected return to work
 - Must notify designee for each day of absence unless other communication arrangement have been specifically approved by the supervisor
 - When two hours notice is impossible, the employee must notify his/her supervisor with as much prior notification as possible given the circumstance.

Leaders will:

- Communicate department attendance procedures and expectation to employees
- Use the timekeeping system as a formal tool to track and document absences and tardiness.
- Provide coaching and/or counseling with employees when attendance becomes a concern, including unreliable or other patterns
- Consult with Human Resources, if further progressive guidance is needed.

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- Designate requests as approved or not approved and absences as scheduled or unscheduled on the PTO Request Form
- Schedule Progressive Guidance

Certain attendance issues will result in assessment of points. Attendance Points are accumulated and tracked on a 12 month rolling period

 Points are incurred over a rolling 365 day period as well as drop off on a rolling calendar basis.

Extenuating circumstances, such as bereavement leave, will not be assessed attendance points. Circumstances will be reviewed by the Manager and HR

For additional information on progressive guidance - Reference the Progressive Guidance Policy Section 15 of the employment handbook

Guidelines for Absenteeism or Tardiness:

Progressive Guidance will be administered under "no fault" principles, which means unscheduled absences or tardiness for any reason will be considered an "occurrence" and subject the employee to counseling. Absences consisting of consecutive scheduled work days will count as one occurrence. Absence due to vacations, personal holiday, work-related injuries or work-related illness, and approved leaves of absence, as well as absences authorized under the Family and Medical Leave Act policy, are scheduled absence and will not result in discipline. Reference Other leaves Policy Section 24 of the employment handbook.

In order that work at MI Blood continues smoothly from the start to the end of the day, it is important that employees are at work on time and that they remain until the end of their shift. Supervisors may give an employee permission to come in late or leave before his/her regularly scheduled quitting time, if the employee has a valid and unavoidable reasoned for doing so.

No Call / No Show
Unscheduled Absence
2 points
Tardy / Other shift variance
1 point for the first 10 events,
2 points for each event thereafter or following 2nd written warning Level

Points	Guidance Level	
8 or more points	Counseling	
12 points	1 st Written Warning	
15 points	2nd Written Warning	
18 points	Final Warning	
	Termination	

EMPLOYEE EXPENSES

Michigan Blood will reimburse certain expenses incurred by employees, namely eligible mileage, travel, and other business expenses. The specific procedures and Forms to obtain approval and receive reimbursement for these types of expenses are detailed in Michigan Blood's Procurement Policy or Mileage and Travel Expense Reimbursement Policy. Both policies and all corresponding Forms are available through the Finance Department and electronically.

In general, mileage expenses must be approved by one's supervisor and submitted in a timely manner. Mileage reimbursement is paid at a rate established by Michigan Blood.

Travel expenses must be approved in advance of travel and may be subject to policy limits. All expenses are reimbursed via normal payroll processes.

PERFORMANCE MANAGEMENT

Michigan Blood's performance management system is based on a common annual timeframe, but it is designed to function as an ongoing process. The process provides a structure to document performance, review expectations, and plan individual development objectives. Functional and behavioral competencies serve as the basis for performance criteria.

Performance Management materials completed by each supervisor are forwarded to the next immediate supervisor for review in advance of meeting with the employee. After meeting with the employee, the material may be forwarded to successive levels of management as appropriate.

Each employee has responsibility to participate throughout the process. Written comments should be submitted within one week of the appraisal meeting.

TERMINATION POLICY

If an employee terminates employment with Michigan Blood, a three-week written notice is necessary.

After notice of termination is given, requests for Paid Time Off cannot be approved. However, time off without pay may be granted by the supervisor.

Failing to report to work without contacting one's supervisor is considered a 'No Call - No Show'. Three consecutive No Call - No Show's are considered voluntary resignation.

Final paychecks will be processed on the regular pay date for the pay period in which the last day of work occurred. Final paychecks will be mailed to the terminated employee.

Health, life and disability insurance policies are terminated on the last day of work. The continuation rules of COBRA will apply if the employee so desires.

The employee has the same right to terminate his or her employment at any time, and for any reason, subject only to the notice requirements. No one, except the CEO/President of Michigan Blood has the authority to enter into any agreement with any employee which alters employment status, severance, policies, Michigan Blood policies, benefits or programs outlined in the Employee Handbook, and any such agreement must be in writing to be effective.

Neither this Employee Handbook nor any other document given to you, or which you may have seen, constitutes a contract of employment or a pledge of employment for any period of time. Your employment with Michigan Blood is terminable at will, either by you or by Michigan Blood for any reason, or without any reason, including on the basis of the needs of Michigan Blood, or at any time employee performance does not measure up to the job requirements, standards or policies.

<u>HOLIDAYS – Please reference the Versiti Holiday Policy – effective 1/2/2017</u>

Michigan Blood observes the following holidays. They are listed as they occur within the Calendar year (Jan – Dec).

New Year's Day – January 1

Memorial Day – Last Monday in May

Independence Day – July 4

Labor Day – First Monday in September

Thanksgiving – Fourth Thursday in November

Christmas Day - December 25

Personal Holiday -

Full time and part time employees receive one paid floating day off between January 1 and December 31. Employees should obtain approval from their supervisor at least one full week in advance of the date they are requesting off. Failure to schedule within appropriate timeframes will result in loss of the holiday.

Holidays occurring on Saturday or Sunday may be observed by Michigan Blood in accordance with area hospital needs.

Qualified full and part time employees receive holiday pay in the regular paycheck as the holiday occurs. Full time employees receive 8 hours of straight time and part time employees receive 4 hours of straight time.

To qualify for holiday pay, full time and part time employees must work at least 50% of their scheduled shift both the scheduled work day immediately preceding and the scheduled work day immediately following the holiday or have approved scheduled time off. Part time schedules and extended PTO will be taken into account.

In addition to receiving holiday pay, non-exempt full and part time employees required to work one of the listed holidays receive pay at 1.5 times their base rate while working on the holiday.

The following employees are not entitled to holiday pay:

- Casual employees
- Temporary employees

PAID TIME OFF

Paid time off (PTO) is designed to acknowledge the diverse needs of our employees and provide full and part time employees with paid time away from work that can be used for vacation, medical, family illness, bereavement or other personal time off. Casual and temporary employees do not receive PTO benefits.

Employees are accountable and responsible for managing their own PTO hours to cover foreseeable use for vacation, illnesses, and other needs. Supervisors are responsible for tracking PTO availability and scheduling PTO to balance the operational needs of the department with the time off preferences of the employee.

Time Off Request forms are available from the supervisor and must be submitted to the immediate supervisor whenever any time off from work is necessary, whether the time off is paid or unpaid.

The PTO year is based on the payroll calendar year and it starts with the first pay period paid in January and ends with the last pay period paid in December. Any remaining days in December are treated as being part of the next calendar year.

ACCRUAL

Employees earn PTO based on the following PTO ACCRUAL CHART:

PTO CHART			
Years of service 0 - 4	Years of service 5 – 9	Years of service 10 - 19	Years of services 20+
0.0577 Per hour paid	0.0769 Per hour paid	0.0962 Per hour paid	0.1154 Per hour paid

Accrued PTO hours earned for the pay period will be added to employee PTO balances at the end of each pay period, not to exceed 2080 hours paid annually. There is no waiting period on PTO balances that have been deposited into an employee's available PTO.

For PTO purposes, "Hours Paid" includes PTO hours paid in lieu of scheduled working hours, but it does not include any PTO payout. Time spent away from work receiving worker's compensation or other disability benefits do not count as Hours Paid. Exempt employees' hours worked in excess forty hours per week are excluded.

SCHEDULING PAID TIME OFF

PTO may not conflict with the overall operational needs of Michigan Blood and is subject to supervisory approval, departmental staffing needs, and established departmental procedures.

In order to schedule staff accordingly, when the need for leave is foreseeable, a minimum of 30 days notice prior to the time being requested should be given. Should such length of time prove impossible due to the situation the employee must still give Michigan Blood as much notice as the situation allows. This is consistent with FMLA provisions per Section 24.

In certain instances, leave must be medically certified before it will be granted. Michigan Blood may require medical certification when leave is requested for the employee's own serious health condition or if the leave is required to care for a seriously ill child, spouse, or parent. Such medical certification shall include:

- a. A statement by the health care provider that the employee is unable to function as assigned or as the individual generally functions
- b. The date upon which the condition commenced
- c. Its expected duration
- d. Enough medical facts to establish the need for leave
- e. When applicable, a statement by the health care provider that the condition of the employee's relative results in the employee being able to function as assigned or as the employee generally functions.

Michigan Blood may request periodic progress reports, including re-certification, in the appropriate case, that the employee is fit to resume work.

Michigan Blood reserves the right to approve or deny PTO requests and cancel previously approved PTO requests if unexpected circumstances arise which require the employee's attendance at work.

An employee may not receive PTO and Short Term Disability benefits for the same time period. Otherwise, employees are required to use available PTO when time off is being taken at the request of the employee. Employees must exhaust PTO prior to receiving Long Term Disability benefits.

Time Off Request forms may be submitted to the supervisor no earlier than October 1 of the calendar year prior to the time off being requested in order for one request of the employee's choice to be granted priority on a seniority basis. PTO requests submitted to the supervisor after March 1 will be given consideration only after other timely requests have been accommodated. The supervisor, in his or her discretion, may extend these timeframes.

PTO may not be taken in less than two (2) hour increments. At the discretion of the

Director, departmental operations may dictate other usage rules such as the use of whole week increments, four hour increments at mobile blood drives, or a limit of the recurring use on work days adjacent to weekends.

PTO is paid at the employee's straight time rate without any shift premiums. PTO is not part of any overtime calculation; it should be paid in accordance with the employee's regular schedule. For example, a part time employee who normally works twenty hours each week would be paid twenty hours of PTO for the week, not forty.

Holidays occurring during an employee's scheduled vacation will not count against PTO.

Employees may not borrow against their PTO banks.

Cash/Check Handling

Employees involved in cash/check handling functions (e.g., accounts payable, payroll, benefits, etc.) will be required to take mandatory paid time off (PTO) for at least five consecutive days per year, to the extent vacation time is available to them

Supervisors will designate all absences as scheduled or unscheduled.

Scheduled PTO

Scheduled PTO is defined as those incidents for which approval was obtained in accordance with the foreseeable nature of the event. In general, 30 days notice is required, but if that is impossible, as much notice as possible must be provided.

Unscheduled PTO

There will always be unforeseeable needs for time away from work. Unscheduled PTO is absences of at least two hours in one shift for which supervisory approval was not received at least 48 hours in advance. When unable to work, the employee must notify his/her supervisor with as much prior notification as possible given the circumstances.

PTO ROLLOVER

At the end of any PTO year, employees with less than 10 years of service can roll no more than 120 hours of PTO to the next PTO year. Employees with at least 10 years of service can roll no more than 160 hours of PTO to the next PTO year.

PAYOUT AT TERMINATION

An employee will be paid for unused PTO following separation of employment.

Accumulated PTO may not be used in lieu of proper notice. After notice has been given, PTO requests will not be approved. However, leave without pay may be granted by the supervisor. PTO that was approved prior to the notice being given may be cancelled at the discretion of the supervisor.

REHIRED EMPLOYEES

Rehired employees will receive credit for prior service for PTO eligibility if the break in service is less than six months. If the break in service is six months or more, PTO accrual is based upon the rehire date.

OTHER LEAVE

FAMILY AND MEDICAL LEAVE

Michigan Blood will grant leave up to 12 weeks per rolling year, pursuant to the Federal Family Medical Leave Act. To be eligible for such leave, an employee must be based out of a Michigan Blood location that employs at least 50 workers within 75 miles of the Center, have been employed for at least 12 months and have worked at least 1,250 hours during the 12 month period preceding the requested leave commencement. Employees who have met this standard are entitled to twelve (12) weeks of unpaid leave (or up to 26 weeks of military caregiver leave to care for a covered service member with a serious injury or illness) during any 12 month period for a qualified reason.

Family Medical Leave Act leave must be taken in one block unless the continuing medical treatment needs of the employee, a member of the employee's family, or a covered service member requires a different regimen. If medically necessary, the employee may request intermittent leave. Intermittent leave or a reduced work schedule is leave taken in separate blocks of time, interspersed with periods of work, due to a single qualifying reason. Employees requesting intermittent leave should schedule their leave to minimize disruption to departmental and Michigan Blood's operations. In such cases, Michigan Blood may temporarily transfer the employee to an alternative position which would more appropriately balance the employee's needs for such leave and the department's needs to avoid disruption of the work force.

Family and Medical Leave under this policy is unpaid. However, Michigan Blood requires that any Paid Time Off (PTO) available be used as part of the 12 week period of leave. Paid time off benefits, if available, will be paid at the employee's regularly scheduled hours per pay period until they are exhausted. Michigan Blood will continue in force all health insurance benefits which the employee had at the time of the leave request. Other benefits will continue only through paid time off. Time spent on leave without pay will not count towards seniority.

Leave must normally be requested at least thirty (30) days in advance. Should such length of time prove impossible due to the situation, the employee must still give Michigan Blood as much notice as the situation allows.

In certain instances, a leave must be medically certified before it will be granted. The circumstance in which medical certification is necessary is where leave is requested for the employee's own serious health condition or if the leave is required to care for a seriously ill child, spouse, parent or covered service member. Such medical certification shall include:

- a. A statement by the health care provider that the employee is unable to function as assigned or as the individual generally functions;
- b. The date upon which the condition commenced;
- c. Its expected duration;

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- d. Enough medical facts to establish the need for leave;
- e. A statement by the health care provider that the condition of the employee's relative results in the employee being unable to function as assigned or as the employee generally functions.

Michigan Blood may request that the health care provider send periodic progress reports, including a re-certification, in the appropriate case, that the employee is fit to resume work.

Leave may be requested for the following reasons:

- a. The birth of a child;
- b. Adoption of a child or foster care placement of a child in the employee's home;
- c. Care for the employee's children, whether biological, adopted, foster, or legal ward, who have a serious health condition. This right ends with the child's 18th birthday unless the child is mentally disabled or incap-able of self care, in which case this right extends throughout the life of the child;
- d. Care for an employee's spouse or parent who has a serious health condition;
- e. Continuing treatment needs of the employee himself or herself who has serious health condition. For the purpose of this policy, the term "serious health condition" is defined to include any long-term illness, injury, impairment, or physical or mental condition requiring continuing care by a health care provider which is serious in nature;
- f. Qualifying exigency leave for families of members of the National Guard and Reserves when the covered military member is on active duty or called to active duty in support of a contingency operation. The leave may commence as soon as the individual receives the call-up notice. (Son or daughter for this type of FMLA leave is defined the same as for child for other types of FMLA leave except that the person does not have to be a minor.);
- g. Military caregiver leave (also known as covered service member leave) to care for an ill or injured service member. This leave may extend to up to 26 weeks in a single12-month period for an employee to care for a spouse, son, daughter, parent or next of kin covered service member with a serious illness or injury incurred in the line of duty on active duty. Next of kin is defined as the closest blood relative of the injured or recovering service member.

An employee who returns to work for at least 30 calendar days is considered to have "returned" to work. Upon return, the employee will be restored to the same or similar

position without any loss of benefits which the employee had accrued prior to the leave.

However, if the position that the employee had prior to the leave would have been phased out, or if the employee would have been laid off due to economic condition regardless of the leave, Michigan Blood has no further duty to guarantee employment upon return from leave.

JURY LEAVE

When an employee is notified of impending jury duty, his/her supervisor should be notified immediately. Michigan Blood reserves the right to request a change of jury schedule.

On scheduled work days, whether full time or part time, when required to serve on a jury, the employee will receive regular pay for scheduled work time representative of the hours missed while serving. To receive pay, copies of jury vouchers and receipts must be turned in to the supervisor. Parking fees are not reimbursed.

On any day that the employee must report to court, but is excused before serving a full day, the employee must report to his/her supervisor for assignment. The employee may be required to work the difference in hours between the jury duty and normal shift length.

Time spent on jury duty which meets the above qualifications for jury leave, is considered as time worked when regular pay, overtime pay, and applicable fringe benefits are computed.

LEAVE OF ABSENCE - OTHER THAN FAMILY AND MEDICAL LEAVE

In certain circumstances, such as when Family and Medical Leave is not an option, a Leave of Absence may be approved at the sole discretion of management.

A written request including estimated length of leave and reason for requesting Leave of Absence must be submitted to one's supervisor a minimum of three weeks in advance of the last day of work. Special circumstances may shorten the advance notification requirement. The request must be approved in writing by the supervisor.

Time spent on leave of absence will not count towards PTO accrual. Benefit plan reinstatement occurs sixty days after return to work.

Failure to return to work at the end of approved leave is considered a voluntary resignation unless documentation is provided stating that the employee is medically restricted from returning. In such a case, the failure to return is considered an involuntary 'leave termination', and any disability provisions will apply.

INSURANCE

1. WORKER'S COMPENSATION INSURANCE

Insurance is carried for all employees in accordance with the Workers' Disability Compensation Act. This insurance covers any accident or injury arising out of and in the course of employment with Michigan Blood.

Employees receiving Workers Compensation insurance benefits may qualify for Family Medical Leave. Otherwise, they will be considered on a Leave of Absence. In either case, it may require use of PTO and terms applicable to Section 23 (PTO) shall apply.

2. PROFESSIONAL LIABILITY INSURANCE

All staff (paid and volunteer) are covered under Michigan Blood's professional and general liability insurance while acting within the scope of their duties in Michigan Blood's operation.

3. **SOCIAL SECURITY**

Michigan Blood participates in the Federal Insurance Contributions Act (F.I.C.A.), commonly referred to as the federal Social Security program. Under this program, the employee and the employer contribute an equal amount of money for coverage.

Information on this may be obtained from a federal government office.

4. TERM LIFE INSURANCE

A life insurance policy, called "Group Term Life", is a fringe benefit provided to all qualifying full time and part time employees.

This is not available for temporary or casual employees.

Full time employees are eligible for coverage the first of the month after the 90 day qualifying period. Part time employees are eligible for coverage the first of the month after the 180 day qualifying period.

Michigan Blood pays the full cost of the premium for this insurance, which provides coverage on the employee's life for their beneficiaries. Upon termination of employment the insurance lapses on the last day of employment. A terminating employee may continue the insurance policy by contacting the insurance company and making mutually satisfactory arrangements for continuation of coverage. Michigan Blood does not guarantee that the life insurance company will continue coverage.

5. SUPPLEMENTAL LIFE INSURANCE

A life insurance policy, called "Supplemental Life", is a fringe benefit available to all qualifying full time and part time employees.

This is not available for temporary or casual employees.

Full time employees are eligible for coverage the first of the month after the 90 day qualifying period. Part time employees are eligible for coverage the first of the month after the 180 day qualifying period.

Participating employees pay the full cost of the premium for this insurance, which provides coverage on the employee, spouse and children if elected. The insurance lapses on the last day of employment. A terminating employee may continue the insurance policy by contacting the insurance company and making mutually satisfactory arrangements for continuation of coverage. Michigan Blood does not guarantee that the life insurance company will continue coverage.

6. SHORT TERM DISABILITY INSURANCE

Michigan Blood has established a plan which covers loss of income due to a short term disability resulting from an accident, sickness, or serious medical condition. After 14 days of continuous disability, this insurance pays 66% of basic monthly earnings, subject to plan maximum.

Full time employees are eligible for coverage the first of the month after the 90 day qualifying period. Part time employees are eligible for coverage the first of the month after the 180 day qualifying period.

This is not available for temporary or casual employees.

7. LONG TERM DISABILITY INSURANCE

Michigan Blood has established a plan which covers loss of income due to a long term disability resulting from an accident, sickness, or serious medical condition. After 90 days of continuous disability, this insurance pays 60% of basic monthly earnings, subject to plan maximum.

Full time employees are eligible for coverage the first of the month after a 90 day qualifying period. Part time employees are eligible for coverage the first of the month after the 180 day qualifying period.

This is not available for temporary or casual employees.

More detailed descriptions of these plans, the conditions and the benefits are available from Human Resources to all qualified employees.

HEALTH BENEFITS

Michigan Blood offers medical, dental, prescription and vision insurance benefits to eligible employees. These benefits are not available for temporary or casual employees.

Medical, dental, prescription and vision coverage is available to all full time employees and qualified dependents. Coverage is effective the first of the month following the 60 day qualifying period.

Dental and vision coverage is available to all part time employees and qualified dependents. Once eligible for dental and vision coverage, these employees are eligible to purchase medical and prescription coverage at the full cost of the insurance. Coverage is effective the first of the month following the 180 day qualifying period.

For a full description of the plans, employees should refer to the plan document. Employees should receive a copy of the summary plan description (SPD), enrollment forms, and participant cards from Michigan Blood before the effective date of their coverage.

Upon termination of employment, an employee is covered through the last day of employment. The Consolidated Omnibus Budget Reconciliation Act (COBRA) continuation rules will apply if the employee so desires.

SAFE HARBOR 401k RETIREMENT PLAN

Michigan Blood offers a Safe Harbor 401k Retirement Plan to qualified full time and part time employees. The Retirement Plan is designed to supplement income during retirement. For qualifying employees Michigan Blood will match up to four percent (4%) of employee contributions into the plan, subject to legal limits.

The 401k plan allows employees to set aside pretax or post tax money to supplement income during retirement. All pretax payroll deductions made into the 401k are excluded from Federal, State, and local income tax until monies are withdrawn, but tax is still withheld for FICA purposes. All post tax payroll deductions made into the 401k are subject to taxes, but will not be taxed upon withdrawal from the account.

To qualify to participate in the 401k four percent (4%) matching contribution, an employee must meet both of the following requirements:

- 6 months of service
- Have attained the age of 18

After the four percent (4%) matching qualifications have been met, employees are eligible to enroll in the 401k plan the first of the month following 6 months of service. Employees who choose to contribute funds into the 401k program will designate a specific amount to be deducted from each payroll check. Each payroll Michigan Blood will deposit the employees elected amount and a matching contribution of up to four percent (4%) into the individual 401k account.

Employees who fail to enroll at that special enrollment period must wait until open enrollment for the next opportunity to contribute to the plan. Open enrollment is offered four times per year, during the months of March, June, September and December.

Changes to the employee's designated investment amount and allocation of funds can be changed at any time. An employee may also terminate the withholding agreement at any time. Employees will receive a copy of the SPD, enrollment forms, and beneficiary designations from Michigan Blood prior to plan qualification.

For employees who participated in the plan prior to 2014, if employment with Michigan Blood ends before reaching retirement age as defined in the Summary Plan Description (SPD), part of the individual's account balance may be forfeited depending on the portion of the account that remains subject to vesting.

For employer contributions that occurred prior to 2014, the table below shows what percentage of the employer portion of the account that a plan participant is entitled to receive based on number of years of vested service.

	Plan Years of Service	Non-Forfeitable Percentage
Employer Contributions	Less than 2 years	0%
	2	20%
	3	40%
	4	60%
	5	80%
	6 or more years	100%
Employee Contributions	Employee contributions into the plan are not subject to any vesting schedule and will always be considered 100% vested	

Any plan participant who dies or becomes permanently disabled while employed by Michigan Blood will have the right to receive 100% of the funds in his/her account regardless of plan years of service.

The Plan Summary is provided for all participants on an annual basis. For a full description of the plan, employees should refer to the plan document, which is available for review in the Human Resources Department. Employees will receive a copy of the SPD, enrollment forms, and beneficiary designations from Michigan Blood subsequent to plan qualification.

EDUCATIONAL TUITION REIMBURSEMENT PROGRAM

Michigan Blood offers an educational tuition reimbursement program with a maximum reimbursement up to \$2,000 for full time employees and \$1,000 for part time employees per fiscal year. Casual employees and Temporary employees are not eligible for Tuition Reimbursement.

Requests may be submitted after a full time employee has been paid for at least 2,000 hours or a part time employee has been paid for at least 1,000 hours in a twelve month period.

The school or college selected must be accredited through the Council on Higher Education Accreditation (CHEA).

The selected course to be taken must be directly related to the employee's work or required in a degree program that is either related to the employee's current position or one that the employee could apply for in a different department within Michigan Blood upon completion of the degree program.

The request must be documented on the Pre-Approval Form and approved by the employee's direct supervisor prior to enrollment.

Employees may obtain pre-approval for tuition reimbursement as a backup to Financial Aid awards. Tuition reimbursement will be adjusted if the employee is receiving any other form of educational assistance: V.A. benefits, education grants, education scholarships, etc. It is the employee's responsibility to provide a complete accounting of any other monies received.

A grade of C or better must be achieved. Upon completion of the course, the employee should route a completed copy of the pre-approved educational tuition reimbursement request with the paid tuition receipt and a copy of the grades to his/her supervisor.

TOBACCO FREE WORKDAY POLICY

Tobacco use is among the leading cause of preventable death and one of the most important current public health issues. As a member of Michigan's healthcare community, Michigan Blood is committed to the health and safety of its employees, donors, patients, volunteers, and visitors. The purpose of this policy is to provide for and promote the healthy, safety, and welfare for all persons who enter Michigan Blood property.

The Michigan Blood facilities and campuses are smoke-free and tobacco-free. This applies to **all** employees, donors, volunteers, patients and visitors. Specifically, this means the use of any tobacco or smokeable product including, but not limited to:

- cigarettes,
- cigars,
- pipes,
- and smokeless tobacco

will be prohibited in buildings or on properties owned or leased by Michigan Blood. In addition, the use of any nicotine delivery device not approved for cessation by the FDA is also prohibited, including e-cigarettes.

Employees may not use prohibited products at any time during their working hours including breaks or unpaid meal times, regardless of where the workday, break, or meal is occurring.

In compliance with our Professional Appearance policy, during work time, the *residual odor* of smoke or tobacco may not be present on any employee's breath, body or clothing. Individuals not in compliance will be asked to remedy that situation, which may require the use of unpaid time.

This policy is intended to provide a framework for employees to use when addressing situations involving tobacco products in a courteous and diplomatic way when a clear course of action may not be apparent. Not all situations that may arise can be contemplated and addressed in this document. Clarification should be sought from management when questions arise.

SHIFT HOURS AND SHIFT PAY POLICY

•	OSE urpose of this Shift Hours and Shift Pay Policy is: To define First, Evening and Night shift hours
	To ensure we have a fair and consistent practice for compensating shift premium for employees who work Evening and/or Night shift hours
	To establish a consistent practice for the tracking and administration of shift pay
hours OUTL Definit Eligibi	e employees who work any time within the designated Evening or Night shift will receive the appropriate shift premium for those hours worked.
POLIC 1. DEI	CY FINITIONS 1.1.1 First (1st) shift: 6:00 A.M. to 6:00 P.M

2. ELIGIBILITY:

2.1 Any non-exempt employee, in an eligible function, who works within the designated Evening and/or Night shift hours, will be compensated for those hours with shift premium pay in addition to their hourly base rate of pay. Non-worked hours such as meals breaks and Paid Time Off (PTO) are not eligible for shift premium. In addition, "on-call worked" hours are not eligible for shift premium.

3. COMPENSATION:

3.1 Evening shift premium is \$1.50 per hour

1.1.2 EVENING SHIFT 6:00 P.M. TO 12:00 MIDNIGHT

1.1.3 NIGHT SHIFT 12:00 MIDNIGHT TO 6:00 A.M.

3.2 Night shift premium is \$2.00 per hour

GR LACTATION ROOM POLICY

PURPOSE

To define and standardize Versiti's ability to provide a space that provides safe and private accommodations for new mothers.

POLICY

1. DEFINITIONS

For the purposes of this Policy, the following term has thIS meaning: "Lactation Room" refers to a specific location within the building that has been allocated for use by new mothers that is schedulable and outfitted appropriately.

2. GENERAL POLICY

Versiti will provide a space when necessary that is properly outfitted for new mothers. This space will have the ability to be scheduled via an outlook calendar. It will be a space that is private and lockable for use by new mothers while at work. This space will be for the specific use by new mothers and will not be utilized for other reasons without a specific office space change request.

3. PROCEDURE

- **3.1** The room will be made available to the staff upon notification to Management/HR of the need.
- **3.2** Scheduling the room will be available by pulling up the outlook calendar for *Lactation Room 203* and requesting the space, this will be auto approved. The only staff allowed use of the room will be new mothers.
- **3.3** The room will remained unlocked, except while it is actively being used, thus creating access to the new mothers but privacy when needed.

Other Versiti Michigan sites will have Lactation Rooms designated when necessary.

We are pleased to welcome you as a staff member of Michigan Blood. It takes many skills to provide blood services; we depend on you to do your best as you work here. If you have questions about any of the material in this Handbook, please bring them to your trainer, supervisor, or a Human Resources staff member. We look forward to working alongside you as together we help people make a life-saving difference through blood products and service excellence.