



GROTON HILL
MUSIC CENTER

STAFF HANDBOOK

February, 2024

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INTRODUCTION ORGANIZATIONAL MISSION AND VALUES

Groton Hill Music's forerunner was the Indian Hill Symphony founded in 1975 and Indian Hill Arts, incorporated in 1985. In 2009, the corporate name was changed to Indian Hill Music, Inc, and in 2021, the corporate name was changed to Groton Hill Music.

Mission Statement – Our mission is to share the transformative power of music through teaching and performing, and giving music generously when there is need. We are guided by the following Core Values which reflect this mission and support our belief that music inspires both our hearts and our minds, encourages the growth and development of the whole person, and is integral to the lives of the individuals and communities we serve.

1. A Community of Excellence Open to All: We maintain the highest standards in music education and performance in a stimulating and inspiring environment open to all.
2. A Feeling of Home: We are a warm, welcoming community where everyone is accepted, respected, and valued.
3. Vibrant Experiences: We energize and enrich lives through extraordinary musical experiences.
4. Personal Growth: We elevate people's lives by offering opportunities to explore, create, flourish, and achieve their goals.
5. Meaningful Connections: We provide multiple pathways to music that encourage social interaction and create a sense of belonging.
6. Giving Music Generously: We make music accessible to all through philanthropic community engagement.
7. Responsible Stewardship: We are committed to caring for the resources entrusted to us and making prudent decisions regarding our organization to ensure a strong future.

Groton Hill Music has a Board of Directors comprised of members of the larger community who are elected for 3-year terms. The Board establishes Groton Hill Music's mission and policies and hires the Chief Executive Officer to implement them. It is the Chief Executive Officer's responsibility to oversee the hiring, supervision and personnel decisions regarding all employees, although the Chief Executive Officer may choose to delegate some of these responsibilities to other managerial staff within the organization.

Because of our educational mission and our reliance on public support, we expect Groton Hill Music employees to adhere to the highest standards of ethics and professionalism in representing Groton Hill Music and carrying out its mission.

PURPOSE

GROTON HILL MUSIC is committed to ensuring fair and respectful treatment of its employees. The Staff Handbook is designed to provide guidance to staff of Groton Hill Music and to ensure equitable treatment of staff employees. The handbook provides an overview of the Human Resource policies, practices, and benefits. Please refer to specific plan documents for details. It is the intention of Groton Hill Music to comply with the letter and spirit of all applicable federal, state, and local regulations at all times. This document is not a part of any intended or implied contract between Groton Hill Music and its staff employees.

Groton Hill Music adheres to the policy of employment-at-will, which permits Groton Hill Music or the Employee to terminate the employment relationship at any time for any reason. The policies contained in this handbook may

be added to, deleted or changed by Groton Hill Music at its sole discretion at any time except that we will not modify our policy of employment-at-will in any case.

Groton Hill Music reserves the right to supplement, revise, interpret, withdraw, add to, remove or otherwise change any or all parts of these guidelines, benefits, or terms and conditions of employment. None of the guidelines, policies, benefits or terms has been or is required to be approved by an employee or employee group.

1. EQUAL EMPLOYMENT OPPORTUNITY

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Groton Hill Music are based on merit, qualifications, and abilities.

Groton Hill Music is committed to a policy of non-discrimination and equal opportunity for all employees and qualified applicants without regard to race, color, religion, gender, gender identification, sexual orientation, national origin, citizenship, ancestry, age, mental or physical disability, veteran, family leave status, or any other category protected under applicable law. Groton Hill Music will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship.

This commitment is evident in all aspects of Groton Hill Music's employment practices and policies, including recruiting, hiring, separating, job assignment, compensation, development, promotion, retirement, discipline, discharge, benefits and training.

It is the responsibility of each employee to treat every other employee or applicant for employment with respect and in a fair, nondiscriminatory manner.

2. AMERICANS WITH DISABILITIES ACT

Groton Hill Music complies with the Americans with Disabilities Act (ADA) of 1990 and its amendments and state and local laws prohibiting discrimination against people with disabilities.

Groton Hill Music does not 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, Groton Hill Music will provide reasonable accommodation to qualified individuals with a disability, as defined by the ADA and state and local laws, who have made Groton Hill Music aware of their disability, provided that such accommodation does not constitute an undue hardship to Groton Hill Music.

Employees with a disability who believe they need a reasonable accommodation to perform the essential functions of their job are encouraged to contact the Chief Executive Officer.

3. CONSOLIDATED OMNIBUS BUDGET RECONCILIATION ACT (COBRA)

Terminated employees may, in certain instances, be eligible under COBRA to temporarily extend their health coverage at group rates where coverage under the Groton Hill Music plan would otherwise end.

Employees who are covered by Groton Hill Music's medical plan have the right to continue coverage if the employee loses group coverage as a result of a reduction in hours of employment, change in eligibility status, or termination of employment (voluntary or involuntary, for reasons other than gross misconduct).

The spouse of an employee covered by one of these plans has the right to choose continuation if they lose group health coverage under the medical plan for any of the following qualifying events:

- Termination of a spouse or domestic partner's employment (for reasons other than gross misconduct), a change in spouse or domestic partner's eligibility status, or a reduction in the spouse or domestic partner's hours of employment.

- Divorce or separate support from the spouse or domestic partner.
- Spouse or domestic partner becomes entitled to Medicare.
- Death of a spouse or domestic partner.

In the case of a dependent child of an employee covered by the medical plan, the dependent has the right to continuation coverage if group health coverage is lost for any of the following qualifying events:

- Termination of the parent's employment (for reasons other than gross misconduct), a change in parent's eligibility status, or a reduction in the parent's hours of employment.
- Parent's divorce or separate support.
- Parent becomes entitled to Medicare.
- Dependent child ceases to be a dependent child as defined under the plan.
- Death of the parent.

By law, the employee or affected family member has the responsibility to inform Groton Hill Music within 60 days of a divorce or separate support or of the date when a child loses eligibility for coverage under any of the group plans. The employee is responsible for notifying Groton Hill Music within 31 days of the qualifying event. Groton Hill Music is then responsible for notifying the plan administrator of a change in dependent children's or spouse's or domestic partner's coverage status.

If coverage continuation is not elected, group coverage will terminate. If coverage continuation is elected, Groton Hill Music is required to provide coverage that is identical to the coverage provided under the plan to similarly situated employees or family members during the same time period. The law requires that eligible employees be afforded the opportunity to maintain health coverage for up to 18 months (or more, under certain circumstances) and/or pursuant to state law. The 18 months may be extended to 36 months (counting from the first qualifying event) if death, divorce, separate support or Medicare eligibility occurs during the 18-month period.

The 18 months may be extended to 29 months (counting from the first qualifying event) if an individual is determined to be disabled (for Social Security disability purposes) and notification of that determination is received by Groton Hill Music within 60 days. The affected individuals must also notify Groton Hill Music within 60 days of any final determination that the individual is no longer disabled.

COBRA also provides that continuation coverage may be reduced for any of the following reasons:

- Groton Hill Music no longer provides group coverage to any of its employees.
- The premium for the continuation coverage is not paid on time.
- The employee becomes covered under another group plan that does not contain any exclusion or limitation with respect to any pre-existing condition.
- The employee becomes entitled to Medicare.
- Coverage has been extended for up to 29 months due to a disability and there has been a final determination that the employee is no longer disabled.

An employee does not have to show that they are insurable to choose coverage continuation. Employees are required to pay the entire premium for coverage continuation plus any administrative fees that may be required by Groton Hill Music (up to two percent for normal continuation coverage; up to 50 percent during months 19 through 29 of a disability extension).

At the end of the 18, 29 or 36 months of continuation coverage, COBRA also requires that the employee be allowed to enroll in an individual conversion plan if one is provided under one of the qualifying group plans.

Questions about COBRA should be directed to the Chief Executive Officer.

4. HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA)

The federal Health Insurance Portability and Accountability Act (HIPAA) allows certain individuals to transition from one employer to another without losing their health insurance coverage or reducing the amount of time they may be excluded from coverage under a new employer's health insurance plan. Details concerning HIPAA are available from the Chief Executive Officer.

Employee protected health information

Protected health information (PHI) is health information that identifies or can be used to identify the individual to whom it relates. Health information is any information, oral or written, relating to the health of an individual, the health care provided to an individual, or payment for health care provided to an individual.

Employee PHI must be kept confidential and private at all times. All PHI collected as part of Groton Hill Music's benefit plans will be maintained, used and disclosed only in compliance with the HIPAA.

For further information about the uses and disclosure of PHI and Groton Hill Music's HIPAA policies and procedures, please contact the Chief Executive Officer.

5. INTRODUCTORY PERIOD

Upon initial hiring by Groton Hill Music, employees are subject to a 90-day Introductory Period. The Introductory Period is intended to provide employees with an opportunity to demonstrate their ability to achieve a satisfactory level of performance, and to determine whether the new position meets their expectations. Groton Hill Music uses this period to evaluate their capabilities, work habits and overall performance.

At any time during the Introductory Period and in consultation with the Chief Executive Officer, the employee's supervisor will determine whether the employee is achieving a satisfactory level of performance. The employee may be discharged if it is determined that performance is not satisfactory. At the end of the Introductory Period, and in consultation with the Chief Executive Officer, the employee's supervisor will determine whether: (1) the employee has satisfactorily completed the Introductory Period; (2) an extension of the Introductory Period is appropriate to further assess the employee's qualifications and performance; or (3) the employee has not satisfactorily completed the Introductory Period, in which case the Chief Executive Officer may determine whether discharge or transfer is appropriate.

TRANSFERS: If a current employee is transferred to a new position, there will be an Introductory Period in which there will be increased communication regarding the employee's performance in the new position. This time period is to provide support to the employee and to help the employee and Groton Hill Music to determine whether the new position is a good fit for the employee.

6. EMPLOYEE CLASSIFICATIONS

Groton Hill Music classifies each employee position as exempt or non-exempt in accordance with guidelines of the Department of Labor's Fair Labor Standards Act (FLSA). Groton Hill Music will inform employees upon hire, transfer or promotion whether their position is exempt or non-exempt. To ensure compliance with the law, if a position's responsibilities change, the employment classification may only be changed with the approval of the Chief Executive Officer.

Exempt: Based upon job responsibilities and how those responsibilities meet legal requirements, these employees are paid for performing a particular set of responsibilities regardless of the time required. Exempt employees generally work in an executive, administrative, or professional capacity which requires the exercise of a high level of discretion and independent judgment. Exempt employees are not required to receive overtime pay under federal and state laws.

Nonexempt: Based upon job responsibilities and how those responsibilities meet legal requirements, these employees are paid by the hour. Nonexempt employees are paid overtime according to specific provisions of federal and state laws; i.e. 1 ½ times the hourly rate for hours actually worked over 40 per week. An employee's supervisor or the Chief Executive Officer must authorize overtime hours before any overtime work is performed.

Regular, Full-Time: Employees with standard hours each week of 8 hours of work per day, 5 days per week, or a flexible schedule based on 40 hours of work per week. Regular, full-time employees are eligible for all Company benefits, accruing at 100%, and may be exempt or nonexempt.

Regular, Part-Time: Part-time employees work a set schedule of less than 40 work hours per week and may be exempt or nonexempt (i.e. paid a set amount regardless of hours worked each week, or paid by the hour). Regular part-time employees who work at least thirty (30) hours per week are eligible for some but not all benefits, subject to the terms and conditions of each applicable benefit plan. Regular part-time employees who work less than thirty (30) hours per week are not eligible for benefits, not eligible for holiday pay and not eligible for paid time off.

Temporary: Temporary employees work a set number of hours per week for a set period of time, usually but not always six months or less. They may be exempt or nonexempt and are not eligible for benefits.

Benefit eligibility and applicability of certain human resource provisions will vary depending on the number of hours an employee works. This document and its provisions cover Staff employees only. Faculty should refer to the Faculty Handbook for information regarding Faculty employment policies.

7. WORK SCHEDULE

Groton Hill Music has established a forty (40) hour weekly work schedule for full time employees, and whenever possible accommodates each individual's personal commitments within the needs of the organization. The workweek is defined as part of each job description.

Exempt employees have obligations such as special projects, occasional periods of heavier workloads, evening meetings, and weekend events that may require them to work beyond their normal business hours. Exempt employees should expect that, at times, the work week will extend beyond 40 hours.

Although Groton Hill Music is under no legal obligation to grant compensatory time to exempt employees, in recognition of the large number of events that Groton Hill Music presents that require an exempt employee to work additional days beyond their standard work days or for hours that exceed 12 in one day, Groton Hill Music would like to provide compensatory time to exempt employees in certain circumstances when possible. As a sign of appreciation and not as earned or accrued time off, Director-level managers can assign compensatory time as they deem appropriate up to a maximum of 16 hours attributable to any given work week. Such time should be used as soon as possible but no later than 4 weeks after that event. Compensatory time does not carry forward and can never be paid out to an employee. Compensatory time not used within 4 weeks will be forfeited. Director-level managers are responsible for tracking exempt employee's work responsibilities, assigning any compensatory time that may be granted, and approving the use of such time.

Compensatory time cannot be granted for periods when an employee works late on their standard work days to finish a project, get regular work done, attend a meeting, attend an event, or other such activities unless the work day exceeds 12 hours. The additional hours worked on their standard work days are considered part of an exempt employee's regular work obligations and not eligible for compensatory time. If an exempt employee is staying late for an event on their standard work days, the employee may be able to come in later than their usual time on that day or the following standard work day provided that work requirements allow for this. If work requirements do not allow for such flexibility, the additional time worked is not eligible for compensatory time.

Non-exempt employees do not receive compensatory time. Non-exempt employees are paid overtime if they exceed 40 hours of work in a given work week. Overtime by non-exempt employees must be approved in advance by their supervisor.

Recording your time

Non-exempt employees are required to maintain an accurate record of all time worked on time sheets and to give the time sheets to their supervisor by Monday morning.

All employees are required to request from their supervisor, in writing, modifications to their schedule including paid time off and compensatory time.

8. RECRUITMENT AND HIRING

Groton Hill Music is committed to recruiting, hiring, and placing applicants on the basis of the applicant's relative knowledge, skills, and abilities. The decision to employ an applicant will be based solely on the individual's qualification for the particular position along with its requisite job skills. Minimum qualifications shall be specified in the job description.

When a new position is established, a job announcement may be prepared identifying the position's responsibilities and overall relationship to the organization for posting or circulation within the organization. Positions that are posted will be open for a minimum application period of 10 business days.

Groton Hill Music is committed to full compliance with federal immigration laws. Each employee (whether U.S. citizen or non-citizen) must provide satisfactory evidence of their identity and legal authority to work in the United States. This verification must be completed as soon as possible, but not to exceed three (3) business days from their first day of employment. All offers of employment and continued employment for positions in the U.S. are conditioned on furnishing satisfactory evidence of identity and legal authority to work in the U.S.

9. COMPENSATION

At the time of hire, new staff employees will receive a letter of employment, a job description, wage or salary and benefits detail and a copy of the Staff Handbook. Work assignments and the scope of responsibility for the position will be discussed at time of hire. In setting compensation, Groton Hill Music may consider, among other things, work experience, education, external labor market rates, and equitable relationship with other jobs within the organization and the organization's ability to pay.

- Exempt employees - payroll will be processed twice a month. Checks are issued on the 15th and 30th of each month. Should those dates fall on a bank holiday or weekend checks will be issued on the weekday prior to the bank holiday or weekend.
- Non-exempt employees - will be paid on a weekly basis. Checks are issued on Friday covering the prior week.

Reimbursed expenses: Employees must obtain pre-approval from their supervisor before incurring reimbursable expenses. Approved expenses must be documented, with receipts attached, and submitted during the pay period in which they were incurred.

10. PARENTAL LEAVE

Employees who have satisfactorily completed the 90-day Introductory Period are eligible for eight (8) weeks of unpaid leave for the purpose of pregnancy, birth of a child, adopting a child under eighteen (18) years of age, adopting a child under the age of twenty-three (23) years if mentally or physically disabled, or in the event of the placement of a child with the employee pursuant to a court order.

When a parental leave ends, the employee will be reinstated to the same or similar position, if available, for which the employee is qualified, as long as the parental leave did not exceed eight (8) weeks.

11. FAMILY AND MEDICAL LEAVE (FMLA)

Groton Hill Music provides Family and Medical leave to eligible employees in accordance with the Family and Medical leave Act of 1993. Under this policy, eligible employees may be granted up to twelve weeks of unpaid, job protected leave for certain family and medical reasons, or up to 26 weeks of military caregiver leave to care for a covered service member with a serious injury or illness. Employees are eligible if they have worked for Groton Hill Music for at least 12 months (need not be consecutive) and have worked at least 1,250 hours over the previous 12 months.

Type of Leave Covered

To qualify as FMLA leave under this policy, the employee must be taking leave for one of the reasons listed below:

1. The birth of a child and in order to care for that child.
2. The placement of a child for adoption or foster care and to care for the newly placed child.
3. To care for a spouse, child or parent with a serious health condition (described below.)
4. The serious health condition (described below) of the employee.

An employee may take leave because of a serious health condition that makes the employee unable to perform the functions of the employee's position. A serious health condition is defined as a condition that requires inpatient care at a hospital, hospice or residential medical care facility, including any period of incapacity or any subsequent treatment in connection with such inpatient care or a condition that requires continuing care by a licensed health care provider. This policy covers illnesses of a serious and long-term nature, resulting in recurring or lengthy absences. Generally, a chronic or long-term health condition that would result in a period of three consecutive days of incapacity with the first visit to the health care provider within seven days of the onset of the incapacity and a second visit within 30 days of the incapacity would be considered a serious health condition. For chronic conditions requiring periodic health care visits for treatment, such visits must take place at least twice a year.

Employees with questions about what illnesses are covered under this FMLA policy or under the company's sick leave policy are encouraged to consult with the Chief Executive Officer.

If an employee takes paid sick leave for a condition that progresses into a serious health condition and the employee requests unpaid leave as provided under this policy, Groton Hill Music may designate all or some portion of related leave taken as leave under this policy, to the extent that the earlier leave meets the necessary qualifications.

5. Qualifying exigency leave for families of members of the National Guard or Reserves or of a regular component of the Armed Forces when the covered military member is on covered active duty or called to covered active duty.

An employee whose spouse, child or parent either has been notified of an impending call or order to covered active military duty or who is already on covered active duty may take up to 12 weeks of leave for reasons related to or affected by the family member's call-up or service. The qualifying exigency must be one of the following:

- Short-notice deployment,
- Military events and activities,
- Child care and school activities,
- Financial and legal arrangements,
- Counseling,

- Rest and recuperation,
- Post-deployment activities and,
- Additional activities that arise out of active duty provided that Groton Hill Music and the employee agree, including agreement on timing and duration of the leave.

“Covered active duty” means:

(a) in the case of a member of a regular component of the Armed Forces, duty during the deployment of the member with the Armed Forces to a foreign country; and

(b) in the case of a member of a reserve component of the Armed Forces, duty during the deployment of the member with the Armed Forces to a foreign country under a call or order to active duty under a provision of law referred to in section 101(a)(13)(B) of title 10, United States Code.

The leave may commence as soon as the individual receives the call-up notice. (Child 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.) This type of leave would be counted toward the employee’s 12-week maximum of FMLA leave in a 12-month period.

6. Military caregiver leave (also known as covered service member leave) to care for an injured or ill service member or veteran.

An employee whose child, parent or next of kin is a covered service member may take up to 26 weeks in a single 12-month period to take care of that service member. Next of kin is defined as the closest blood relative of the injured or recovering service member.

The term “covered service member” means:

(a) a member of the Armed Forces (including a member of the National Guard or Reserves) who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness; or

(b) a veteran who is undergoing medical treatment, recuperation, or therapy, for a serious injury or illness and who was a member of the Armed Forces (including a member of the National Guard or Reserves) at any time during the period of 5 years preceding the date on which the veteran undergoes that medical treatment, recuperation, or therapy.

The term “serious injury or illness” means:

(a) in the case of a member of the Armed Forces (including a member of the National Guard or Reserves), an injury or illness that was incurred by the member in line of duty on active duty in the Armed Forces (or existed before the beginning of the member’s active duty and was aggravated by service in line of duty on active duty in the Armed Forces) and that may render the member medically unfit to perform the duties of the member’s office, grade, rank, or rating; and

(b) in the case of a veteran who was a member of the Armed Forces (including a member of the National Guard or Reserves) at any time during a period when the person was a covered service member, a qualifying (as defined by the Secretary of Labor) injury or illness that was incurred by the member in line of duty on an active duty in the Armed Forces (or existed before the beginning of the member’s active duty and was aggravated by service in line of duty on active duty in the Armed Forces) and that manifested itself before or after the member became a veteran.

If medically necessary, an employee may use intermittent or reduced schedule leave for a FMLA leave. This can be taken in a series of short-term leaves or as a reduced work schedule. Requests to use intermittent leave requires

appropriate medical documentation confirming the medical necessity of intermittent or reduced schedule leave. If an employee requests intermittent or reduced schedule leave, Groton Hill Music may require the employee to transfer temporarily to a position with equivalent pay and benefits for which the employee is qualified and which better accommodates the recurring leave periods than does the employee's regular position.

FMLA leave is unpaid leave. Groton Hill Music may require an eligible employee or the employee may elect to substitute paid leave (paid time off) for any unpaid FMLA leave. Upon exhaustion of available paid leave, the remainder of any leave will be unpaid. The combination of paid and unpaid leave used under the FMLA will not exceed twelve workweeks in any twelve-month period.

A request for leave must be submitted in writing 30 days in advance, except in the case of a medical emergency, and the employee must provide appropriate documentation/medical certification to support the FMLA leave request.

Medical Insurance - If the employee has health insurance through Groton Hill Music, Groton Hill Music will continue to pay the employer portion of the coverage during the approved FMLA leave. The employee will be responsible for paying the employee share throughout the leave. Payments should be made on a weekly basis or as arranged with the Chief Executive Officer.

Under certain circumstances, Groton Hill Music may recover its share of health plan premiums paid during the period of unpaid FMLA leave from an employee. Groton Hill Music may recover its share of health plan premiums if the employee fails to return to work after their unpaid FMLA leave entitlement has been exhausted or expires, unless the reason the employee does not return is due to circumstances beyond the employee's control or the continuation, recurrence or onset of a serious health condition of the employee or the employee's family member, or a serious injury or illness of a covered service member, that would otherwise entitle the employee to leave under FMLA. If the employee's failure to return to work is based on a serious health condition, the employee will be required to provide supporting medical certification of the condition. If the employee does not provide such certification within 30 days or the reason for not returning to work is not beyond the employee's control, Groton Hill Music may recover all of the health plan premiums it paid during the period of unpaid FMLA leave.

All Other Benefits - For the first 30 days of an unpaid leave, Groton Hill Music will continue to pay the employer portion for any additional benefits that Groton Hill Music may provide. The employee is responsible for paying the employee portion of such benefits for the first 30 days and will be responsible for paying 100% of the benefit premiums thereafter. The Chief Executive Officer can provide benefit contribution amounts. During any period of the approved leave that the employee is not receiving a paycheck from Groton Hill Music, the employee is responsible for paying the employee portion of their benefits. Benefit payments should be made on a weekly basis for non-exempt employees or twice a month for exempt employees or as arranged with the Chief Executive Officer.

An employee on an approved FMLA leave will not accrue additional benefits or seniority that would have occurred if not on leave, such as paid time off or holiday pay.

Return from Leave - When the employee returns from FMLA leave, the employee will be restored to the same or equivalent position, unless (a) they would have ceased working for Groton Hill Music if no leave had been taken, or (b) they, with or without reasonable accommodation, cannot safely perform the essential functions of a job to which they may be returned as determined between the employee, their supervisor and the Chief Executive Officer.

Nursing Mother Provisions

In compliance with federal law which requires the provision of unpaid, reasonable break time for an employee to express breast milk, Groton Hill Music subscribes to the following policy:

- An employee will be provided an unpaid, reasonable break time to breastfeed or express breast milk for their nursing child for the first year of the child's life. These break periods will be given each time the employee has need to breastfeed or express breast milk.

- A private, sanitary employee lactation area is provided for breastfeeding employees to breastfeed or express their milk during work hours. This area provides an electrical outlet, comfortable chair, and nearby access to running water. Employees may use their private office area for breastfeeding or milk expression, if they prefer.
- A refrigerator will be made available for safe storage of expressed breast milk. Employees may use their own cooler packs to store expressed breast milk, or may store milk in a designated refrigerator/freezer. Employees should provide their own containers, clearly labeled with name and date. Those using the refrigerator are responsible for keeping it clean.
- Management and staff are expected to provide an atmosphere of support for breastfeeding employees.

12. MASSACHUSETTS PAID FAMILY AND MEDICAL LEAVE

The State of Massachusetts provides paid family and medical leave in accordance with the Paid Family and Medical Leave Act of 2018.

Explanation of Benefits

Beginning January 1, 2021, an employee may be entitled to up to:

- 12 weeks of paid family leave in a benefit year for the birth, adoption, or foster care placement of a child, or because of a qualifying exigency arising out of the fact that a family member is on active duty or has been notified of an impending call to active duty in the Armed Forces;
- 20 weeks of paid medical leave in a benefit year if an employee has a serious health condition that incapacitates them from work;
- 26 weeks of paid family leave in a benefit year to care for a family member who is a covered service member undergoing medical treatment or otherwise addressing consequences of a serious health condition relating to the family member's military service

Beginning July 1, 2021, an employee may be entitled to up to:

- 12 weeks of paid family leave in a benefit year to care for a family member with a serious health condition.
- 26 total weeks, in the aggregate, of paid family and medical leave in a single benefit year.

The employee's weekly benefit amount will be based on the employee's earnings, with a maximum benefit of \$1,149.90 per week.

Job Protection, Continuation of Health Insurance, No Retaliation

Generally, if an employee takes family or medical leave under the law they must be restored to their previous position or to an equivalent position, with the same status, pay, employment benefits, length-of-service credit and seniority as of the date of the leave.

Groton Hill Music must continue to provide for and contribute to the employee's employment-related health insurance benefits, if any, at the level and under the conditions coverage would have been provided if the employee had continued working continuously for the duration of such leave.

It is unlawful for any employer to discriminate or retaliate against an employee for exercising any right to which they are entitled under the paid family and medical leave law. An employee or former employee who is discriminated or retaliated against for exercising rights under the law may, not more than three years after the violation occurs, institute a civil action in superior court.

Contributions to the Family and Employment Security Trust Fund

Employer and employee contributions are made to the Department of Family and Medical Leave (DFML) Family and Employment Security Trust Fund. An employer will be responsible for sending contributions to the DFML for

all employees though they may deduct a portion from the employee pay. The contribution rate may be adjusted annually.

Effective Rates in 2024 for employers with 25 or more employees:

Family Leave Contribution	.18%
Medical Leave Contribution	.70%
Total Contribution Amount	.88%

Currently, the total contribution amount is 0.88% of wages. Of that .0.88% total contribution amount, there is a split: 0.18% is a family leave contribution and 0.70% is a medical leave contribution. Under the law, employers are responsible for a minimum of 60% of the medical leave contribution (.0.42% of wages), but are permitted to deduct from employees’ wages up to 40% of the medical leave contribution 0.28% of wages) and up to 100% of the family leave contribution (.0.18% of wages).

For the medical leave contribution, Groton Hill Music will contribute 0.42% of wages and the remaining 0.28% will be deducted from your employee earnings.

For the family leave contribution, .0.18% of wages will be deducted from your employee earnings.

Private Plan Exemption:

An employer that offers paid leave with benefits that are at least as generous as those provided under the law may apply for an exemption from paying the Department of Family and Medical Leave Family and Employment Security Trust Fund contribution. An employer may apply for an exemption from the medical leave contribution, family leave contribution, or both. The details of any private plan must be provided to employees by an employer at the same time as this notice. Employees enjoy rights to job-protected leave and from discrimination and retaliation under the law even if their employer is approved to provide leave benefits through a private plan.

Groton Hill Music does not have an approved private plan.

How to File a Claim

Employees must file claims for paid family and medical leave benefits with the DFML using the Department’s forms. Forms and claim instructions will be available on the Department’s website www.mass.gov/DFML. When the employee files a claim directly with the state, the following is the necessary employer information:

Groton Hill Music, Inc.
122 Old Ayer Road
Groton, MA 01450
Federal Employer ID # 04-2867945

Employees are required to provide at least 30 days’ notice to Groton Hill Music of the anticipated starting date of any leave, the anticipated length of the leave and the expected date of return. An employee who is unable to provide 30 days’ notice due to circumstances beyond their control is required to provide notice as soon as practicable.

Payment for Concurrent Leave

Any paid leave provided under an employer policy and paid at the same or higher rate than paid leave available under this law shall count against the allotment of leave benefits available under this law.

Department of Family and Medical Leave (DFML) Contact Information

The Massachusetts Department of Family and Medical Leave

Charles F. Hurley Building

19 Staniford Street, 1st Floor

Boston, MA 02114

(617) 626-6565

For more detailed information, please consult the Department's website: www.mass.gov/DFML

13. SMALL NECESSITIES LEAVE

Under the Small Necessities Leave Act employees are entitled to a total of 24 hours of unpaid leave during any 12 month period to:

- Participate in school activities directly related to the educational advancement of their child;
- Accompany their child to routine medical or dental appointments;
- Accompany an elderly relative to routine medical or dental appointments or appointments for other professional services.

To be eligible for such leave an employee must:

- Have been employed for at least 12 months;
- Have worked for at least 1,250 hours during the previous 12 months.

The 24 hours of leave available under this benefit are in addition to the 12 weeks of leave provided for under the federal Family and Medical Leave Act. The 24 hours may be taken within the 12-month calendar year period and the time may be taken on an intermittent or reduced-time schedule, but in increments no less than two hours.

An employee may elect, or Groton Hill Music may require that the employee first use paid time off before taking the unpaid Small Necessities Leave. If the necessity for the leave is foreseeable, the employee must provide the employer with a minimum of seven days' notice. If it is not foreseeable, the employee must provide as much notice as practicable.

The use of SNLA leave will not result in the loss of any employment benefit that accrued prior to the start of the leave. Groton Hill Music may require that the request for leave be supported by written certification.

14. JURY DUTY

Groton Hill Music will pay an employee his or her normal pay for up to three days of jury duty less the amount the court pays for those three days. The employee must submit their jury duty pay vouchers when returning to work, indicating that jury duty was performed and specifying the dates.

15. MILITARY LEAVE

Employees are entitled to take an unpaid military leave of absence for various types of military duty (e.g. active duty, annual training, and reserve duty). Employees will be granted a leave of absence for up to five years and reinstated in accordance with the Uniform Services Employment and Reemployment Rights Act (USERRA).

Employees are required to provide Groton Hill Music with advance notice of the need for military leave, unless military necessity prevents such notice or it is otherwise impossible or unreasonable for employees to provide Groton Hill Music with notice. Employees may use accrued paid time off for the military absence in order to receive pay.

16. DOMESTIC VIOLENCE LEAVE

The Massachusetts Domestic Violence Leave Law requires employers with fifty (50) or more employees to provide all employees, regardless of their eligibility for other leaves, up to fifteen (15) days of unpaid leave in any (12) twelve month period to address the consequences of “abusive behavior” to themselves or family members.

Eligibility

To be eligible, an employee must be taking the leave from work to seek or obtain medical attention, victim services or legal assistance, to secure housing, to obtain a protective order from a court, to appear in court before a grand jury, to meet with a district attorney or other law enforcement official, to attend child custody proceedings, or to address other issues directly related to the abusive behavior against them or their family member.

Any employee who is the perpetrator of the abusive behavior against their family member is not eligible for leave under this law.

Definitions

For the purposes of this policy, the following words shall have the following meanings:

“Family members” means:

- Spouses, parents and step-parents, children and step-children, siblings, grandparents, grandchildren, persons with whom an employee has a substantive dating or engagement relationship, persons with whom an employee has a child in common, and persons with whom an employee is in a guardianship relationship.

“Abusive behavior” means:

- Domestic violence – defined as abuse against an employee or the employee’s family member by (i) a current or former spouse of the employee or the employee’s family member, (ii) a person with whom the employee or the employee’s family member shares a child in common, (iii) a person who is cohabitating with or has cohabitated with the employee or the employee’s family member, (iv) a person who is related by blood or marriage to the employee, or (v) a person with whom the employee or employee’s family member has or had a dating or engagement relationship;
- Stalking – defined as willfully and maliciously engaging in a knowing pattern of conduct or series of acts over a period of time directed at a specific person that seriously alarms or annoys that person and would cause a reasonable person to suffer substantial emotional distress, and making a threat with the intent to place the person in imminent fear of death or bodily injury;
- Sexual assault – defined as rape or assault with intent to commit a rape; indecent assault and battery; enticement of a minor into prostitution, human trafficking, or commercial sexual activity; or subjecting, recruiting, enticing, harboring, transporting, providing, or obtaining by any means, or attempting to subject, recruit, entice, harbor, transport, provide, or obtain by any means, another person to engage in commercial sexual activity, a sexually-explicit performance or the production of unlawful pornography, or causing a person to engage in commercial sexual activity or a sexually-explicit performance or the production of unlawful pornography; or kidnapping.

“Abuse” means:

- Attempting to cause or causing physical harm;
- Placing another in fear of imminent serious physical harm;
- Causing another to engage involuntarily in sexual relations by force, threat, or duress or engaging or threatening to engage in sexual activity with a dependent child;
- Engaging in mental abuse, which includes threats, intimidation, or acts designed to induce terror;
- Depriving another of medical care, housing, food or other necessities of life; or
- Restraining the liberty of another.

Compensation and Benefits during Leave

Leave taken under this policy will not be paid. Employees taking leave will be required to exhaust any unused paid time off. Paid time off benefits will not accrue during leave.

An employee on leave will be retained on Groton Hill Music's health plan on the same condition as active employees, except that the employee must make arrangements with Groton Hill Music's Chief Executive Officer for timely payment of the employee's portion of the premium in order to continue such coverage. If any premium payment is more than thirty (30) days late, coverage may be lost during the remainder of the leave. In circumstances where an employee is on paid leave, the appropriate deductions will be made in the same manner as the employee's regular paycheck.

An employee on leave of absence will not be eligible for holiday pay during a designated holiday observed during the leave. If a holiday falls during a full week of leave, the holiday will count towards the employee's fifteen (15) days of total leave.

In the event that an employee fails to return from leave, the employee may be liable for the employer's share of any insurance premiums.

Return from Leave

Upon returning to work, an employee will be restored to their original or an equivalent position, unless economic, business, or other circumstances unrelated to their use of leave under this policy would have resulted in a change in their employment status or position.

The use of leave under this policy shall not result in the loss of any employment benefits accrued prior to the date on which the leave taken under this policy commenced.

Employees shall not be subject to retaliation for their use of leave under this policy.

Company Notifications Regarding Leave

Except in cases of imminent danger to an employee or an employee's family member, an employee must provide thirty (30) days' advance notice of the need to take leave when the need is foreseeable. When thirty (30) days' notice is not possible, an employee must provide notice as soon as practicable, which should be on the same day or next business day of the date that the employee becomes aware that the leave is needed.

If leave is due to imminent danger to an employee or an employee's family member and advance notice cannot be provided, the employee must then notify Groton Hill Music within three (3) workdays. Such notice may be communicated by the employee, a family member, or any professional person who may be assisting in addressing the abusive behavior and its consequences, such as a counselor, a social worker, a health care worker, a member of the clergy, a shelter worker, a lawyer, or a legal advocate.

When seeking leave, an employee is required to provide documentation within 5 business days after returning to work showing that the leave was taken to address issues directly related to the abusive behavior, as defined above. Any of the following documents are sufficient. An employee need not show evidence of an arrest, conviction, or other law enforcement documentation.

- A protective order, order of equitable relief, or other documentation issued by a court as a result of abusive behavior sought or issued on the date(s) of leave.
- A document on the letterhead of the court, provider, or public agency stating that the employee sought assistance relating to the abusive behavior on the date(s) of leave.

- A police report or statement of a victim or witness provided to police, including a police incident report, documenting the abusive behavior on the date(s) of leave.
- Documentation that the perpetrator of the abusive behavior has admitted to sufficient facts to support a finding of guilt of abusive behavior or has been convicted of, or has been adjudicated a juvenile delinquent by reason of, any offense constituting abusive behavior and which is related to the abusive behavior that necessitated the leave under this section.
- Documentation of medical treatment or counseling as a result of the abusive behavior on the date(s) of leave.
- A sworn statement, signed under the penalties of perjury, provided by a counselor, social worker, health care worker, member of the clergy, shelter worker, legal advocate, or other professional who has assisted in addressing the effects of the abusive behavior on the date(s) of leave.
- A sworn statement signed under the penalties of perjury, from the employee attesting to being a victim of abusive behavior or is the family member of a victim of abusive behavior.

If an unscheduled absence occurs as a result of abusive behavior, no negative action will be taken against an employee within thirty (30) days from the last unauthorized absence in the instance of consecutive days of unauthorized absences.

Any documentation provided to Groton Hill Music in connection with abusive behavior leave will be maintained in the employee's employment record only for as long as required to make a determination of eligibility for leave.

All information related to a leave due to abusive behavior will be kept confidential and will not be disclosed, except to the extent that disclosure is (i) requested or consented to, in writing, by the employee, (ii) is ordered to be released by a court, (iii) is otherwise required by applicable federal or state law, (iv) is required in the course of an investigation authorized by law enforcement, including, but not limited to, an investigation by the attorney general, or (v) is necessary to protect the employee's safety or the safety of other employees at Groton Hill Music.

17. SICK LEAVE

For staff employees who are not eligible for Paid Time Off, beginning July 1, 2015, or upon date of hire if after July 1, 2015, Groton Hill Music provides one hour of earned sick leave for every 30 hours worked, up to a maximum accrual and usage of 40 hours per fiscal year. Staff employees who are not eligible for Paid Time Off may use this sick leave beginning 90 calendar days after commencement of employment and thereafter as it accrues. Up to 40 hours of unused earned sick leave may be carried over to the next fiscal year but eligible employees are not entitled to use more than 40 hours in one fiscal year. Unused earned sick leave is not paid upon separation of employment.

The earned sick leave may only be used to:

- Care for the eligible employee's child, spouse, parent, or parent of a spouse, who is suffering from a physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care; or
- Care for the eligible employee's own physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care; or
- Attend the eligible employee's routine medical appointment or a routine medical appointment for their child, spouse, parent, or parent of spouse; or
- Address the psychological, physical or legal effects of domestic violence.
- Travel to and from an appointment, a pharmacy, or other location related to one of the above purposes for which the time was taken.

If an eligible employee is committing fraud or abuse by engaging in an activity that is not consistent with the above allowable purposes for earned sick leave, Groton Hill Music may discipline the staff member for misuse of sick leave.

When sick leave use is foreseeable or pre-scheduled, the eligible employee must make a good faith effort to provide seven days' advance notice of the use of earned sick leave, except when the eligible employee learns of the need to use earned sick leave within a shorter period.

An eligible employee may not use earned sick leave if they are not scheduled to be at work during the period of use. The smallest amount of sick leave an eligible employee can use is one hour. For uses above one hour, eligible employees may use earned sick leave in 15 minute increments.

The eligible employee must submit a self signed Request for Sick Leave Form indicating that they were absent due to one of the above allowed reasons only. Payment for eligible sick leave will be made in the normally scheduled pay cycle that coincides with when the sick leave was taken.

Certification signed by a health care provider indicating the need for earned sick leave taken is required when the earned sick leave exceeds 24 consecutively scheduled work hours, or exceeds 3 consecutive days on which the eligible employee was scheduled to work, or occurs within 2 weeks prior to an eligible employee's final scheduled day of work before termination of employment, or occurs after 4 unforeseeable and undocumented absences within a 3-month period. With regard to the need for leave related to domestic violence, written certification can be a restraining order or other documentation of equitable relief issued by a court of competent jurisdiction, a police record documenting the abuse, documentation that the perpetrator of the abuse has been convicted of one or more domestic violence offenses where the victim was a family or household member, medical documentation of the abuse, a statement provided by a counselor, social worker, health worker, member of the clergy, shelter worker, legal advocate or other professional who has assisted the eligible employee in addressing the effects of the abuse on the eligible employee or their family or a signed written statement from the eligible employee attesting to the abuse. The certification does not need to be submitted prior to the use of earned sick leave and it does not need to explain the nature of any illness or the details of the domestic violence. Certification must be submitted within 7 days after taking earned sick leave for which such documentation is required, unless, for good cause shown, the eligible employee requires more time to provide such certification.

Following a break in service of up to 4 months, an eligible employee shall maintain the right to use unused earned sick leave accrued before the break in service. Following a break in service of between 4 and 12 months, an eligible employee shall maintain the right to use earned sick leave accrued before the break in service if their unused bank of earned sick leave equals or exceeds 10 hours. Following a break in service of up to 12 months, an eligible employee maintains their vesting days from Groton Hill Music and do not need to restart the 90 day vesting period.

18. OTHER LEAVES OF ABSENCE

Personal Leave - A personal leave of absence without pay may be granted to an employee at the discretion of the Chief Executive Officer and will be based on Groton Hill Music staffing requirements.

Workers Compensation – Approved workers' compensation leaves of absence run concurrently with FMLA.

An employee on unpaid leave of absence not covered under FMLA or worker's compensation will not accrue paid time off and is responsible for payment of all benefit premiums.

19. INCLEMENT WEATHER

In the event of inclement weather when the Groton Hill Music remains open, administrative employees should use their own judgment about coming to work and must notify their supervisor if they will not report to work. If the employee opts not to work, the employee must use paid time off.

20. BEREAVEMENT LEAVE

An employee will be entitled to bereavement leave after a death in their immediate family (including a spouse, child, parent, brother, sister, grandparents, grandchild, or the child, parent, brother, sister, grandparent, grandchild of a spouse, or on the occasion of the death of another person living in the employee's household.) Bereavement leave is granted with pay for a period not to exceed three workdays. Paid time off may be used to extend bereavement leave time.

21. VOTING TIME

Voting hours generally now extend well beyond the normal workday. Therefore, the need for employees to take time off from work to vote should be minimal. Nonetheless, employees who are unable to vote outside of work hours or by mail-in ballot may submit a request to their supervisor to take up to two (2) hours of unpaid time to vote. Where work schedules allow, Groton Hill Music will provide employees with the opportunity to make up missed work time to vote. Otherwise, paid time off may be used to cover this time.

22. HARASSMENT AND DISCRIMINATION

Groton Hill Music is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Groton Hill Music expects that all relationships among persons in the office will be business-like and free of explicit bias, prejudice and harassment.

Groton Hill Music has developed this policy to ensure that all its employees can work in an environment free from unlawful harassment, discrimination and retaliation. Groton Hill Music will make every reasonable effort to ensure that all concerned are familiar with these policies and are aware that any complaint in violation of such policies will be investigated and resolved appropriately.

Any employee who has questions or concerns about these policies should talk with their supervisor or the Chief Executive Officer.

These policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions. In other words, no one should make the mistake of engaging in discrimination or exclusion to avoid allegations of harassment. The law and the policies of Groton Hill Music prohibit disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions, privileges and prerequisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to complement and further those policies, not to form the basis of an exception to them.

Equal employment opportunity

It is the policy of Groton Hill Music to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, genetic information, or any other characteristic protected by law. Groton Hill Music prohibits any such discrimination or harassment.

Retaliation

Groton Hill Music encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Groton Hill Music to promptly and thoroughly investigate such reports. Groton Hill Music prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.

Sexual harassment

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, “sexual harassment” is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment, b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or c) such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment.

Title VII of the Civil Rights Act of 1964 recognizes two types of sexual harassment: a) quid pro quo and b) hostile work environment. Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual’s body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

Harassment

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of their race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, or that of their relatives, friends or associates, and that: a) has the purpose or effect of creating an intimidating, hostile or offensive work environment, b) has the purpose or effect of unreasonably interfering with an individual’s work performance, or c) otherwise adversely affects an individual’s employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer’s premises or circulated in the workplace, on company time or using company equipment by e-mail, phone (including voice messages), text messages, social networking sites or other means.

Individuals and Conduct Covered

These policies apply to all applicants and employees, whether related to conduct engaged in by fellow employees or by someone not directly connected to Groton Hill Music (e.g., an outside vendor, consultant or customer).

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

Reporting an Incident of Harassment, Discrimination or Retaliation

Groton Hill Music encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender’s identity or position. Individuals who believe that they have been the victim of such conduct should discuss their concerns with their immediate supervisor or the Chief Executive Officer. See the complaint procedure described below.

In addition, Groton Hill Music encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that their behavior is unwelcome and to request that it be discontinued. Often this

action alone will resolve the problem. Groton Hill Music recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

Complaint Procedure

Individuals who believe they have been the victims of conduct prohibited by this policy or believe they have witnessed such conduct should discuss their concerns with their immediate supervisor or the Chief Executive Officer.

Groton Hill Music encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore, while no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly in a discreet and timely manner with the understanding that every investigation requires a determination based on all the facts. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Groton Hill Music will maintain confidentiality throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Upon conclusion of the investigation, should Groton Hill Music determine that inappropriate or unlawful discrimination or harassment has occurred appropriate preventive, corrective or remedial action will be taken. For example, Groton Hill Music may redistribute this policy, have discussions with or send written communications to employees or others, conduct education or training programs, or take disciplinary action up to and including dismissal of those who have engaged in the discrimination, harassment or other inappropriate behavior.

At the conclusion of the investigation, Groton Hill Music will notify the employee who brought the complaint of the outcome of the investigation including any corrective or preventative action to be taken.

Groton Hill Music recognizes that false and malicious accusations (as opposed to complaints that, even if erroneous, are made in good faith) may have serious effects on innocent persons. Employees found to have made false accusations of harassment, discrimination, or retaliation may be subject to appropriate disciplinary action, up to and including termination of employment.

The following is a list of the state and federal government agencies that enforce employment discrimination laws in Massachusetts:

Massachusetts Commission Against Discrimination

One Ashburton Place, Suite 601
Boston, MA 02108
(617) 994-6000

484 Main Street, Room 320
Worcester, MA 01608
(508) 453-9630

Please also note that while it is not Groton Hill Music's intent to become involved in consensual activity, co-workers who are parties to a relationship must conform their workplace interactions to professional standards.

23. DRUGS, ALCOHOL AND SMOKING

Groton Hill Music is committed to the well being of our employees, to the safety of the workplace, and to provision of high-quality services to our students and the public. For these reasons, we do not tolerate the unlawful possession, use, manufacture, distribution, or dispensation of controlled substances in the workplace or during work time. Moreover, employees must come to work free from the influence of alcohol, illegal drugs, and unlawfully used prescription medications. The use of alcohol on Groton Hill Music's premises is prohibited, except in connection with Groton Hill Music sponsored social events where an appropriate authorization has been procured beforehand. Violation of this policy may result in dismissal and appropriate notification of authorities.

Smoke-Free Work Environment – As part of its efforts to provide a comfortable, safe, and healthy work environment, Groton Hill Music prohibits smoking in all work areas or anywhere on the premises. Groton Hill Music is a smoke-free environment.

24. BENEFITS

Holidays

Groton Hill Music offers a schedule of at least ten (10) paid holidays each year for benefit eligible staff. The schedule is set and published at the start of each Fiscal Year.

If any holiday falls on Saturday, it normally will be observed on the preceding Friday; if it falls on Sunday, it normally will be observed on the following Monday.

An eligible Employee must be an active employee on the workday before and after the holiday in order to be paid for the holiday.

Paid Time Off (PTO)

Employees are encouraged to utilize their PTO during each calendar year.

According to the schedule below, eligible full-time employees receive PTO each calendar year for the purpose of conducting personal business, in case of illness, and for rest away from work. Eligible part-time employees (i.e. staff members working 30 or more hours per week) receive PTO on a prorated basis. As indicated, PTO will increase with the number of years of employment at Groton Hill Music.

Accrual of PTO begins upon the date of employment and will be based upon the calendar year. PTO days accrue on a monthly basis and are earned on the last day of the month for each month worked. Typically, PTO may not be used until an employee has worked a minimum of three months. Exceptions to this waiting period may be made with the approval of the employee's supervisor. Employees are allowed to borrow from their current calendar year PTO accrual; however, upon termination an employee who has borrowed PTO will be required to reimburse Groton Hill Music for the time that exceeds the time accrued and earned for the calendar year to date. When employment is ended for any reason, accrued and earned PTO that has not been used and not forfeited will be paid.

To be eligible for PTO, the employee must obtain pre-approval from their supervisor. To assure appropriate staffing needs are met, not all requests for PTO may be approved, therefore, the employee should request PTO as far in advance as possible. Under certain circumstances, when the employee is not able to request approved PTO in advance due to emergencies, sickness, etc., the employee must notify their supervisor as soon as possible.

For Calendar Year 2024, no unused PTO may be carried over into the next calendar year. Any unused PTO that is not used by the end of the calendar year cannot be carried over, will be forfeited, and is not paid out upon termination.

An employee who has exhausted their PTO may request additional unpaid time by submitting a written request to their supervisor. Approval for additional unpaid time off will be at the discretion of the supervisor. PTO is designed to provide maximum flexibility for the employee and may be used for vacation, personal time, and sick leave. Unlike a structure with a separate vacation policy with a lower number of allotted vacation days and a separate sick time only policy, the PTO policy allows staff to use time off in a more flexible manner, however, if an employee uses all of their PTO for vacation or personal time and then has a need for sick leave later in the year, no additional PTO will be provided to the employee. In certain cases, an employee may be allowed to borrow from their next calendar year PTO accrual for a late calendar year sickness; however, if borrowing is approved, upon termination an employee who has borrowed PTO will be required to reimburse Groton Hill Music for any time that exceeds the time accrued and earned.

An employee’s supervisor must approve all PTO requests. The decision to approve PTO or not will be based on the business and staffing needs of Groton Hill Music. For this reason, staff are encouraged to not wait until the end of the calendar year to request PTO or attempt to take a large amount of PTO at the end of the calendar year. If there are any tasks that must be completed during a specific time, requested PTO may not be approved. Also, if there are coverage concerns due to multiple requests for PTO during the same timeframe (particularly but not limited to the months of August and December), consideration will be given to the employee whose request was received first. PTO requests that are not approved do not result in additional unused PTO carryover into the next calendar year. The maximum carryover of calendar year 2023 unused PTO is four (4) days regardless of the reason for the unused PTO. Any unused PTO beyond four (4) days at the end of calendar year 2023 will be forfeited. Beginning in calendar year 2024, any unused PTO that is not used by the end of the calendar year, regardless of the reason, will be forfeited.

<u>Duration of Employment</u>	<u># of Annual PTO Days</u>	<u>Monthly Accrual</u>
0-3 Years	15 Days	1.250 Days
More than 3 Years	20 Days	1.667 Days

NOTE: Staff employees who began their employment prior to July 2021 may have a different PTO accrual rate based upon the schedule that was in place at the time of their hire.

NOTE FOR STAFF MEMBERS WHO ARE ELIGIBLE FOR PTO: Groton Hill Music may choose to close for winter break between Christmas and New Year’s Day. While it is possible that staff members in certain positions may need to work for some portion of that closed break, any time off that a staff member does take during that closed break will be considered additional paid time off above and beyond a staff member’s PTO accrual. Under no circumstances though will a staff member be paid for more than their standard number of hours. None of this additional paid time off will be paid out to an employee upon termination. A staff member must be an active employee on the workday before and the workday after the end of any closed break in order to be paid for any additional time off. Additionally, any work done during this time period is not eligible for compensatory time.

Cafeteria Plans

Groton Hill Music offers a cafeteria-style benefits program. Eligible employees may elect to participate in one plan offering or many. Eligible employees can use their own contributions to purchase a variety of plans, including health insurance, dental insurance, short-term disability insurance, accident insurance, medical and dependent care reimbursement, life insurance, and 403(b) retirement accounts. Plan eligibility for all employees is subject to the requirements of each individual plan. Depending upon the individual plan, there may be certain times of the year when employees may enroll.

Health and dental insurance are available to eligible Regular staff employees working at least 30 hours per week each week.

All employees of Groton Hill Music are covered by worker’s compensation insurance, as required by law. An employee must report any work-related injury or illness immediately to the Chief Executive Officer.

For more information about any of these plans, please see the Chief Executive Officer.

Additional Benefits

- Discounted tuition for private lessons, classes and ensembles at Groton Hill Music for employees and any immediate family members. Immediate family members are defined as the employee's spouse and minor children and grandchildren under the age of 25. The employee will pay only 65% of the stated tuition cost. Any registration fees will also be waived.
- Employees may attend Groton Hill Music select concerts free of charge or at reduced rates depending upon the concert, subject to availability and Groton Hill Music discretion.
- Groton Hill Music believes strongly in the value of on-going training and education of its employees. Employees are encouraged to speak to their immediate supervisor about such opportunities.

25. PERFORMANCE MANAGEMENT

Groton Hill Music is committed to ensuring that employee performance management is an ongoing, interactive, two-way communication between supervisors and employees regarding employee success in meeting job responsibilities and the extent to which the organization supports employee success. In addition to ongoing informal discussions between supervisors and employees (which may be prompted by either the employee or their supervisor), Groton Hill Music expects to conduct a performance evaluation of each new employee following the first ninety (90) days of employment and between June 1 and July 31 of each fiscal year.

26. EMPLOYMENT REFERENCES

All requests for employment references should be directed to the Chief Executive Officer. When Groton Hill Music receives a request for information from another person or entity about an employee, either during employment or after the employee's employment has ended, it is the organization's policy to provide only the following:

- a. Dates of employment
- b. Last job title

In general, Groton Hill Music's policy is to furnish any additional information about work performance or employment only upon receiving a signed release from the former employee.

27. TERMINATION

This document is not a part of any intended or implied contract between Groton Hill Music and its employees. Employees at Groton Hill Music are employed "at will", which means that there is not a contract for employment, either expressed or implied, and that either the employee or Groton Hill Music may terminate the employment with or without notice at any time and for any or no reason or cause.

• Voluntary Termination

Employees anticipating termination are encouraged to give written notice of their intent to resign and to give as much notice as possible. Minimum suggested notice is two (2) weeks for all staff. Final paychecks for time worked will be processed in the normal pay-cycle and will be paid in the next pay period that is processed following the termination date.

- **Involuntary Termination** - Discipline and/or discharge may result for reasons including, but not limited to, inappropriate behavior and/or unsatisfactory performance. Final paychecks for time worked will be processed and paid on the day of termination.

Paid Time Off - An employee who terminates employment, regardless of the reason, will be paid all paid time off accrued and earned and not forfeited as of the date of termination/last day worked. The payment will be based on the employee's current base hourly rate of pay. Employees will be required to obtain pre-approval from their supervisor in order to access accrued paid time off after giving notice. Paid time off payouts will be issued in the employee's final paycheck.

Any Groton Hill Music property, such as office keys, records, files, equipment, etc., must be returned at the time of termination or before terminating employment. A terminating employee should notify Groton Hill Music of the address to which Groton Hill Music should send further correspondence.

28. GRIEVANCE PROCEDURE

Groton Hill Music fosters open communication with employees about job performance and programmatic/curricular directions. Employees are encouraged to provide workplace feedback to their supervisor. If an employee has an issue that cannot be resolved satisfactorily at that level, the matter may be brought to the attention of the Chief Executive Officer for final resolution.

29. WORK PRODUCTS, FILES AND INTELLECTUAL PROPERTY

All supplies, materials, and work products of an employee if purchased by Groton Hill Music shall remain the property of Groton Hill Music after resignation, discharge, or layoff of that employee. Work files and other papers shall remain with the organization. Ideas, procedures, and programs developed by employees in the course of their employment become the property of Groton Hill Music. Groton Hill Music will make every effort to give credit of authorship in such situations.

30. CONFIDENTIAL AND PROPRIETARY INFORMATION

Groton Hill Music expects that as a condition of employment, employees will keep all proprietary information strictly confidential. Confidential and proprietary information includes, without limitation, information relating to (a) development, research, marketing and fundraising activities; (b) strategic plans; (c) the identity and special needs of Groton Hill Music's students, partners and prospective vendors; and (d) the people and organizations with whom Groton Hill Music has relationships and those relationships. Confidential information also includes all information that Groton Hill Music may receive or has received from others with any understanding, express or implied, that it will not be disclosed.

Employees may not discuss Groton Hill Music's procedures, operations, research, financial concerns, strategies, and the like with anyone outside of Groton Hill Music, including media or representatives of another organization, without the permission of the Chief Executive Officer. If an employee cannot reach the Chief Executive Officer, the employee should assume that they should not disclose the information.

Employees who improperly use or disclose confidential and proprietary information will be subject to disciplinary action, up to and including termination of employment and legal action, regardless of whether the employee actually benefits from the disclosed information.

All confidential and proprietary information is the property of Groton Hill Music, even after the termination of employment, regardless of the reason for the termination. In addition, terminated employees have a continuing obligation to respect the confidentiality of information that pertains to the business of Groton Hill Music that they may have obtained during their employment. Accordingly, employees may be required to sign a Confidentiality Agreement as a condition of employment.

31. REPORTING ABUSE OR NEGLECT

It is the policy of Groton Hill Music to provide students with an environment that is free of abuse and neglect. Definitions and examples of abuse and neglect include:

Physical Abuse: the intentional infliction of harm to a student's body which includes, but is not limited to: hitting, pushing, pulling, pinching, twisting, bending, or manipulating any part of a student's body in a manner that causes discomfort, pain, and/or injury.

Sexual Abuse: any physical or verbal interaction with a student that contains any sexual contact or content. This includes, but is not limited to: inappropriate touching, sexually oriented remarks or comments, remarks about a student’s sexual orientation, and/or remarks about a student’s private and/or personal sexual behavior.

Verbal Abuse: derogatory, demeaning, or insulting comments made to a student. Verbal abuse can also take the form of speaking to students in harsh, angry, or loud tones. Teasing, joking, mocking, and playing tricks that are unwanted, or done at a student’s expense, are also a form of verbal abuse.

Emotional Abuse: excessive, aggressive, or unreasonable demands on a student. This could include, but is not limited to: expectations that are beyond the level of understanding of a student, expectations that are above the tolerance level of a student, verbal attacks, degradation, humiliation, bullying, chronic rejection, crossing boundaries that compromise the personal space of a student, and/or confinement.

Neglect: the unwillingness to provide essential care and supervision to a student. This care includes, but is not limited to, providing a clean and sanitary environment, and a safe environment that is free of hazards that could affect the health and/or safety of a student.

If there is concern that a child or incapacitated adult has been abused or neglected or is living in hazardous conditions, it should be reported to the Chief Executive Officer immediately. Groton Hill Music is obligated under Massachusetts State law to report such concerns to the Department of Children and Families. If any employee of Groton Hill Music is suspected of abusing or neglecting a student, such situation will be investigated by the Chief Executive Officer to determine what action is warranted. These actions could include, but are not limited to, a review of the Abuse and Neglect Policy with the individual who is involved, disciplinary action up to and including termination of or against such person, reporting the abuse or neglect to law enforcement for further investigation, and/or filing a complaint against the alleged perpetrator with an appropriate governmental entity.

32. WRITTEN INFORMATION SECURITY POLICY

Groton Hill Music does collect “personal information about Massachusetts residents” and Groton Hill Music is required to maintain policies and specific standards relating to the protection of this information. PERSONAL INFORMATION is defined as an individual’s first and last name, used in conjunction with a confidential identifier.

The following is a list of commonly used “confidential identifiers”:

- Social security numbers
- Credit card numbers
- Driver’s license numbers
- Bank account numbers
- Passport numbers

It is important that all employees review, understand and adhere to Groton Hill Music’s Written Information Security Policy. The Chief Executive Officer has been designated to supervise implementation of this policy. Should an employee require clarification regarding any of the information contained within this document, it is their responsibility to contact the Chief Executive Officer immediately.

Staff employees of Groton Hill Music are entrusted with data that meet the definitions of PERSONAL INFORMATION. Therefore, it is necessary that staff employees protect the confidentiality of this information. The purpose of this policy is to formally notify staff employees of the guidelines that Groton Hill Music has established to protect PERSONAL INFORMATION and to assist staff employees in complying with the requirements of Massachusetts’ Data Protection Law.

Groton Hill Music has:

1. Identified the paper and electronic records, systems, storage media and portable devices containing PERSONAL INFORMATION.

2. Evaluated the reasonably foreseeable internal and external risks to PERSONAL INFORMATION.
3. Evaluated the effectiveness of Groton Hill Music's data protection safeguards to implement appropriate protection practices.

Groton Hill Music does not maintain PERSONAL INFORMATION unless the data is reasonably necessary to accomplish a legitimate business purpose. Groton Hill Music restricts physical and system access to individuals who have a legitimate business purpose to possess such access and updates its controls whenever there is a material change in a business practice that impacts the security of PERSONAL INFORMATION.

Groton Hill Music has implemented an Incident Response Plan to timely evaluate, document and, if necessary, report any potential breach of PERSONAL INFORMATION. This process is consistent with the law and involves an independent review of all security events to determine whether remediation is necessary.

Any employee who accesses, inspects, acquires or discloses PERSONAL INFORMATION without a legitimate business reason is subject to disciplinary action, up to and including termination of employment.

Employee adherence to the following guidelines is required.

Any form of PERSONAL INFORMATION that a staff employee accesses must relate directly to that staff employee's official responsibilities as an employee of Groton Hill Music.

PERSONAL INFORMATION, in electronic or paper format, must never be left unattended in clear view within any area of Groton Hill Music. Paper containing PERSONAL INFORMATION must be maintained in a locked location at the end of each business day. Electronic PERSONAL INFORMATION must be password protected.

PERSONAL INFORMATION may be discussed only with authorized individuals and shared with those who have a specific business need for such information. PERSONAL INFORMATION may never be discussed with, or disclosed to, any individual that is not employed by Groton Hill Music.

PERSONAL INFORMATION must never be removed from the Groton Hill Music premises.

Any potential loss, theft or misplacement of PERSONAL INFORMATION must be immediately reported to the Chief Executive Officer.

Employees may never expose PERSONAL INFORMATION, or areas housing PERSONAL INFORMATION, to potential unauthorized access.

Password Protection Policy

Employees are required to protect system passwords from loss, theft or disclosure.

Employees are prohibited from disclosing their password(s) to anyone. This includes, but is not limited to, co-workers, vendors or family members. Groton Hill Music will maintain one master list of passwords to be used in the case of emergency only and to be used only by personnel authorized by the Chief Executive Officer. That master list will be maintained in a locked location.

Employees are prohibited from maintaining any password, in written form, in an unsecured area or in any area that may be accessible to another individual.

Employees are prohibited from providing their passwords to anyone over the telephone without exception. Accordingly, any such inquiries must be immediately reported to the Chief Executive Officer.

Employees are prohibited from maintaining passwords on a cell phone, laptop computer, USB Drive, PDA or similar device or at any offsite location.

Employees are prohibited from using any password, other than their own, to attempt to access any Groton Hill Music system.

Employees are prohibited from reusing passwords that they have used, or are using, for their "personal" accounts.

Employees must close all applications and logoff their personal computer at the end of their work day.

Upon termination, that employee's access to PERSONAL INFORMATION will be terminated and all passwords and user names will be deactivated.

Email Acceptable Use Policy

The transmission of PERSONAL INFORMATION through email or any form of instant messaging (IM) is strictly prohibited. Under no circumstances may employees include PERSONAL INFORMATION within an email.

The posting of PERSONAL INFORMATION on social networking, career or peer to peer sites is prohibited.

Employees must exercise caution when receiving email from unknown sources. Although there may be a legitimate business purpose to open an email message from an unknown party, employees should use extreme caution when doing so. The opening of links, attachments or executable programs, contained within any email that is received from an unknown party is prohibited as it may result in the installation of malicious software.

Mobile and Portable Storage Device Acceptable Use Policy

This includes, but is not limited to laptop computers and USB Drives (USB).

Employees are prohibited from downloading, transferring, transporting or storing PERSONAL INFORMATION on a laptop computer, USB drive, cell phone, or other mobile or portable device.

Employees are prohibited from using a non-Groton Hill Music issued USB device, for any purpose, at Groton Hill Music. Employees must ensure that Groton Hill Music USB drives are never left unattended.

Employees are required to immediately report any loss or theft of a USB drive, or other portable device, to the Chief Executive Officer.

Incident Response Plan

It is critical that any potential loss, theft, disclosure or other compromise of PERSONAL INFORMATION be reported immediately to the Chief Executive Officer. It is the responsibility of the Chief Executive Officer to timely evaluate the nature of the event, determine whether adequate protective controls were in place, document all pertinent information, determine whether the event constitutes a breach and, if necessary, ensure that the appropriate post-incident notifications are made.

The following information must be addressed:

- 1) Date and Time that the event was discovered
- 2) Potential Witnesses to the event
- 3) Location of the event
- 4) The specific types of PERSONAL INFORMATION involved
- 5) The volume of PERSONAL INFORMATION involved
- 6) Whether acceptable protective controls were in place
- 7) If controls were present, list all measures
- 8) If protective controls were not present, report the event to the following Massachusetts agencies: Attorney General Office of Consumer Affairs Secretary of State – Archives Information Technology Division
- 9) If protective controls were not present, each Massachusetts resident whose data was compromised must be notified in writing.

Monitoring Employee Compliance

This policy will be included in the staff handbook distributed to all staff employees to ensure that the policy is operating in a manner reasonably expected to prevent unauthorized access or use of PERSONAL INFORMATION. Additionally, Groton Hill Music management may periodically monitor employee compliance with the policy. This monitoring may include formal reviews and day to day observation of employee practices.

33. ELECTRONIC COMMUNICATIONS AND EQUIPMENT

Groton Hill Music provides computers, computer files, e-mail, voicemail, Internet, and software such as ASAP, our school management software, to employees for business purposes. While Groton Hill Music does not prohibit or prevent employees from using e-mail, voicemail, and Internet access for personal purposes, Groton Hill Music expects that such personal use will not diminish the use of these systems for Groton Hill Music business.

Although Groton Hill Music respects its employees' privacy, employees should not expect their privacy to extend to communications and information on Groton Hill Music's information systems or the use of Groton Hill Music owned equipment, networks, or supplies. Employees should be aware of Groton Hill Music's policy with respect to the use of Groton Hill Music's information systems, including e-mail, voicemail, Internet access, and computer network systems.

Groton Hill Music's information systems are Groton Hill Music property, and employees do not have a personal privacy right in any matter received, sent or maintained on these systems. To ensure compliance with this policy, computer and e-mail usage may be monitored by Groton Hill Music. Groton Hill Music has the right to access information and may conduct unannounced inspections of these information systems. Electronic mail and voicemail are electronic communication tools provided by Groton Hill Music solely to enable employees to send and receive business information rapidly and efficiently. Employees are required to comply with the following guidelines:

- E-mail, voicemail, Internet access and other Groton Hill Music provided information systems should be used for Groton Hill Music business only.
- Voicemail greetings and e-mail signatures should be professional and reflect an appropriate business image. The listing of a personal website or e-mail address as part of a company e-mail is not permitted.
- E-mail or voicemail messages may be inadvertently intercepted by someone who was not meant to receive them. For that reason, employees should use good judgment when sending confidential information by e-mail or voicemail.
- Groton Hill Music communication resources may not be used for personal gain or entertainment (e.g. sending chain letters).
- Employees are prohibited from using Groton Hill Music's information systems in any way that may be disruptive, offensive or harmful to others, including, but not limited to the surfing of web sites, downloading the display or transmission of cartoons, gossip, profanity, vulgarity, material with a sexual content or any other material that would violate Groton Hill Music's policies or be construed as offensive, harassing or disrespectful to the average person (e.g. a racial or ethnic slur, sexual comments or images).
- Employees are prohibited from stealing, using, or disclosing another employee's code or password and from accessing any e-mail or voicemail other than their own.

Employees should understand that e-mail and voicemail messages might have to be disclosed in lawsuits, and sometimes to people and companies with interests adverse to Groton Hill Music's interests. Accordingly, employees should use their best judgment in sending or responding to an e-mail message or in leaving a voicemail message.

Groton Hill Music purchases and licenses the use of computer software for business purposes and does not own the copyright to this software or its related documentation. Unless authorized by the software developer, Groton Hill Music does not have the right to reproduce such software for use on more than one (1) computer. Employees may only use software on local area networks or on multiple machines in accordance with the relevant software license agreement. Groton Hill Music prohibits the illegal duplication of software and its related documentation.

The unauthorized use, installation, copying, or distribution of copyrighted, trademarked, or patented material on the Internet is expressly prohibited. As a general rule, if employees did not create material, do not own the rights to it, or have not obtained authorization for its use, it should not be put on the Internet. Employees are also responsible for ensuring that the person sending any material over the Internet has the appropriate distribution rights.

Internet

To prevent computer viruses from being transmitted through the system, there will be no unauthorized downloading of any software. Each employee's supervisor must approve all software downloaded. Copyrighted materials likewise must be respected. Failure to observe copyright or license agreements may result in disciplinary action or legal action by the copyright owner.

Employees should notify their immediate supervisor or the Chief Executive Officer upon learning of any violation of this policy. Employees who violate this policy may be subject to disciplinary action, up to and including termination of employment. Therefore, Groton Hill Music reserves the right to monitor Internet traffic, and retrieve and read any data composed, sent, or received through online connections and stored in Groton Hill Music's computer systems.

Telephone Usage and Monitoring

It is important to keep Groton Hill Music telephone lines free for business calls. Accordingly, employees should keep personal phone calls to a minimum. Employees may be required to reimburse Groton Hill Music for any charges to Groton Hill Music resulting from their personal use of the telephone. Abuse of Groton Hill Music's telephones may be grounds for disciplinary action, up to and including termination of employment.

To ensure effective telephone communications, employees should always speak in a courteous and professional manner. If employees are unable to help a caller, they should transfer the caller to someone who may be able to provide assistance.

To ensure that the students, their families, donors and others receive the service they deserve, Groton Hill Music is committed to developing employees so that they may perform to the best of their abilities. For employees whose primary responsibility is servicing Groton Hill Music's customers over the telephone, Groton Hill Music may, at its discretion, monitor and/or record business conversations. It is essential to regularly monitor the performance of employees in these types of positions to ensure that customer service skills are developed and that each employee is meeting the standards and expectations specifically set for that position. If an employee's position is one in which telephone monitoring and/or recording will be utilized, the employee will be notified and given information about the process.

Use of the Mail System

Employees should not use Groton Hill Music's mailing address to receive personal mail. The use of Groton Hill Music paid postage for personal correspondence is also prohibited. Personal use of Groton Hill Music's mail system may be grounds for disciplinary action, up to and including termination of employment.

Use of Groton Hill Music Equipment

All Groton Hill Music equipment should be used correctly and kept in good repair. If a piece of equipment is not working properly, employees should not attempt to fix it. Instead, employees should notify their supervisor promptly. Misuse and abuse of equipment is costly and may result in disciplinary action, up to and including termination of employment.

34. NO WEAPONS IN THE WORKPLACE

To ensure that Groton Hill Music maintains a workplace intended to be safe and free of violence, Groton Hill Music believes it is important to establish a clear policy that specifically addresses weapons in the workplace.

Except as set forth below, Groton Hill Music prohibits all persons who are engaged in Groton Hill business or who enter any Groton Hill premises, including all buildings, surrounding areas including but not limited to sidewalks, walkways, driveways, open areas within the parking lots, and all lawn areas from carrying or storing a

handgun, firearm, explosive, knife, or other weapon of any kind, including related paraphernalia, regardless of whether the person is licensed to carry the weapon or not.

Exceptions to this standard will be police officers, security guards, or other persons who have been given written consent by the CEO of Groton Hill Music to carry a weapon. Also excluded from this policy are locking knives with a blade of less than 4 inches that are used for routine maintenance.

Employees who are legally permitted by state law to carry a weapon must keep it locked and stored in their vehicle and not bring it onto any other area of the property.

Any employee disregarding this policy will be subject to disciplinary action up to and including immediate termination.

Employees who are aware that another employee or patron has possession of or is storing a weapon while on Groton Hill Music property in violation of this policy, or that another employee is carrying a weapon while engaged in Groton Hill business regardless of whether they are on Groton Hill property, should immediately report it to the CEO.

Groton Hill Music reserves the right to conduct reasonable searches of any Groton Hill property and work areas.

This policy is in no way intended to prohibit an employee who has a concealed handgun license or who otherwise lawfully possesses a firearm from storing the weapon in a locked, privately owned vehicle in a parking area that is owned by Groton Hill Music.

35. CODE OF ETHICS

Groton Hill Music is committed to maintaining high ethical standards in carrying out its mission to share the transformative power of music through teaching and performing and giving music generously when there is need.

Our Code of Ethics is based upon being respectful of all members of our community, maintaining integrity in our actions, acting as responsible stewards of the resources entrusted to us, and making prudent decisions regarding our organization to ensure a strong future.

Groton Hill Music maintains the following Code of Ethics:

- Acting honestly, truthfully, and with integrity in all of our transactions and dealings
- Being a good corporate citizen and complying with both the spirit and the letter of the law at all times
- Maintaining the highest standards in music education and performance
- Maintaining a conflict of interest policy designed to avoid any such conflicts and appropriately addressing any actual or apparent conflicts that may arise
- Offering a warm and welcoming environment where everyone is accepted, respected, and valued
- Treating everyone fairly, with dignity, and in a non-discriminatory manner
- Being responsible, transparent, and accountable for all of our actions
- Providing a positive work environment, free from harassment and maintaining appropriate policies and procedures designed to safeguard employee welfare
- Acting responsibly when carrying out our mission and serving our community

Groton Hill Music is committed to ensuring that our Code of Ethics is appropriately practiced by all members of our organization. All employees of Groton Hill Music are expected to follow Groton Hill Music's Code of Ethics principles.

36. CODE OF CONDUCT

Groton Hill Music expects its employees to maintain a high standard of personal conduct.

To ensure orderly operations and provide for the best possible work environment, Groton Hill Music expects employees to follow those rules of conduct that will protect the interests and safety of all employees, clients, and the organization. It is not possible to list all the forms of behavior that are considered unacceptable in the workplace. The following are examples of infractions of rules of conduct that may result in disciplinary action, up to and including termination of employment:

- Excessive absenteeism or tardiness or unauthorized absence during the workday;
- Engaging in any felonious activity;
- Threatening, intimidating, coercing or interfering with fellow employees or clients;
- Vending, soliciting or collecting unauthorized contributions;
- Soliciting employees or clients to join religious or other organizations;
- Making false, vicious or malicious statements in general or about any employee, client, or board member;
- Unauthorized release of any confidential information;
- Failure to follow instructions, either verbal or written;
- Negligence in the use of, misuse of, disposing of, damaging, or theft of any property owned by Groton Hill Music, another employee or client;
- Reporting to work under the influence of alcohol or a controlled substance or the possession thereof;
- Behavior which in any manner endangers the life, health, safety or well-being of other persons, or which has, or threatens to have an adverse effect on Groton Hill Music operations or management;
- Insubordination or other disrespectful behavior;
- Sexual or any other unlawful or unwelcome harassment;
- Smoking on the premises;
- Falsifying records of Groton Hill Music, its employees or clients;
- Immoral conduct or indecency;
- Incompetence or inefficiency;
- Failure to faithfully fulfill assigned responsibilities;
- Failure to maintain records required by Groton Hill Music;
- Failure to continue professional development;
- Unsatisfactory performance;
- Violation of safety, health, and child abuse and neglect prevention policies and procedures;
- Unauthorized use of telephones, mail system, copy-machine, FAX, email, computers or other employer-owned equipment.

This list is not intended to be all-inclusive. It is provided to illustrate conduct that is deemed to be damaging to Groton Hill Music.

Any employee conduct that in the opinion of Groton Hill Music interferes with or adversely affects its reputation and ability to service clients shall be sufficient grounds for disciplinary action. This conduct can include but is not limited to any linking of Groton Hill Music in any social media outlet, print media outlet or any other public source. This action can range from oral warnings to immediate discharge.

To decide upon the appropriate action, Groton Hill Music, at its sole discretion, may consider the seriousness of the employee's conduct, employment record, ability to correct the conduct, the effect of the conduct on others and any other circumstances.

37. ELECTION ACTIVITIES OF INDIVIDUALS ASSOCIATED WITH 501(c)(3) ORGANIZATIONS

Groton Hill Music is a 501(c) (3) organization. By law, none of Groton Hill Music's staff time or resources can be used for partisan political purposes - that is, to support or oppose any candidate running for public office. This is a strict prohibition and any perceived violation could result in a costly investigation by the public, media and/or IRS, and possibly the loss of Groton Hill Music tax-exempt status.

Examples of activities that must be avoided include:

- Making statements that favor or oppose candidates or political parties at any Groton Hill Music event or meeting or in any Groton Hill Music official publication, including the website.
- Posting comments that favor or oppose candidates or political parties on any Groton Hill Music social media, including our blogs, Facebook pages, Twitter accounts (including staff accounts that are associated with Groton Hill Music), etc.
- Allowing a candidate, political party, PAC or any group working in a partisan political way to use Groton Hill Music space without charge.
- Giving a candidate, political party, PAC or any group working in a partisan political way any Groton Hill Music mailing list.
- Forwarding an email from a candidate, political party, PAC or any partisan political group that came to your Groton Hill Music email account. Do not use your Groton Hill Music email address to subscribe to candidate or political material. If you inadvertently get candidate or political emails at work, delete them and unsubscribe your Groton Hill Music email address from the email list.
- Viewing candidate, party or other political events or advertisements online on an Groton Hill Music computer.
- Making statements or handing out literature supportive or critical of a candidate, political party or PAC at an Groton Hill Music event.
- Using the copier or postage machine to make copies of campaign materials or to mail them.
- Making or receiving telephone calls in support or opposition of a candidate using Groton Hill Music phones. If you receive such calls at work, advise the caller to call you at home or on your cell phone during non-working hours.
- Wearing political buttons or t-shirts while representing Groton Hill Music at any event or meeting or in the office.
- Putting partisan political signs, bumper stickers or political buttons up in your office area or office window.
- Using Groton Hill Music funds to pay to attend political events hosted by political parties, campaigns, or other entities, or attending these events while representing Groton Hill Music.

Note: These organizational prohibitions do not inhibit your individual participation in election activities, provided you do not use any Groton Hill Music resources or act or represent that you are acting as an employee, volunteer, officer or Board member of Groton Hill Music. Examples of the type of individual election activities you may participate in include voting, making personal financial contributions to candidates, volunteering for a candidate on your own time (weekends or evenings when you are not working for Groton Hill Music), or running for office.

38. CONFLICT OF INTEREST

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of Groton Hill Music business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

No presumption of guilt is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to the Chief Executive Officer or the Board of Groton Hill Music as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties. Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which Groton Hill Music does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving Groton Hill Music.

This policy establishes only the framework within which Groton Hill Music wishes the organization to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Please contact the Chief Executive Officer for more information or questions about conflicts of interest.

39. WHISTLE BLOWER POLICY

Groton Hill Music expects its directors, other volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

Each director, volunteer, and employee of Groton Hill Music has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of policies of the organization, applicable laws or regulations (hereinafter collectively referred to as "Concerns").

Authority of Audit Committee

All reported Concerns will be forwarded to the Audit Committee in accordance with the procedures set forth herein. The Audit Committee shall be responsible for investigating, and making appropriate recommendations to the Board of Directors, with respect to all reported Concerns.

No Retaliation

This Whistleblower Policy is intended to encourage and enable directors, volunteers, and employees to raise Concerns within Groton Hill Music for investigation and appropriate action. With this goal in mind, no director, volunteer, or employee who, in good faith, reports a Concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, a volunteer or employee who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

REPORTING CONCERNS

Employees

Employees should first discuss their Concern with their immediate supervisor. If, after speaking with their supervisor, the individual continues to have reasonable grounds to believe the Concern is valid, the individual should report the Concern to the Chief Executive Officer of Groton Hill Music. In addition, if the individual is uncomfortable speaking with their supervisor, or the supervisor is a subject of the Concern, the individual should report their concern directly to the Chief Executive Officer of Groton Hill Music.

If the Concern was reported verbally to the Chief Executive Officer of Groton Hill Music, the reporting individual, with assistance from the Chief Executive Officer, shall reduce the Concern to writing. The Chief Executive Officer is required to promptly report the Concern to the Chair of the Audit Committee, which has specific and exclusive responsibility to investigate all Concerns. If the Chief Executive Officer of Groton Hill Music, for any reason, does not promptly forward the Concern to the Audit Committee, the reporting individual should directly report the Concern to the Chair of the Audit Committee. Contact information for the Chair of the Audit Committee is included in Appendix A below and may also be obtained from the Chief Executive Officer. Concerns may also be submitted anonymously. Such anonymous Concerns should be in writing and can be sent directly to the Chair of the Audit Committee.

Directors and Other Volunteers

Directors and other volunteers should submit Concerns in writing directly to the Chair of the Audit Committee. Contact information for the Chair of the Audit Committee is included in Appendix A below and may also be obtained from the Chief Executive Officer.

Handling of Reported Violations

The Audit Committee shall address all reported Concerns. The Chair of the Audit Committee shall immediately notify the Audit Committee, the Board Chair, and the Chief Executive Officer of any such report. The Chair of the Audit Committee will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns.

All reports will be promptly investigated by the Audit Committee, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concern.

The Audit Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or violations. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

Confidentiality

Reports of Concerns, and investigation pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

Policy Distribution

This policy is included in the Groton Hill Music employee handbook which is distributed to new employees when they begin employment at Groton Hill Music. Handbooks are also redistributed to employees periodically when changes to policy are required. Employees must electronically acknowledge that they have received a copy of the employee handbook. This policy is also distributed to directors as part of the orientation packet distributed to new

board members when they join Groton Hill Music. The Groton Hill Music website also indicates that a Groton Hill Music Whistleblower Policy exists and that interested parties may request a copy by contacting the Groton Hill Music Chief Executive Officer.

APPENDIX A

Chair of the Audit Committee Contact Information:

Peter Ashton

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Groton, MA 01450