

### Audit, Compliance and Governance Committee

**Meeting Date** 

May 16, 2023



### Audit, Compliance, & Governance Committee Members

Thomas M. Flynn, Chair	Lonnie Reed	
Managing Member, Coral Drive Partners,	Board Chair	
LLC		

Matthew Ranelli	Joanne Wozniak-Brown
Partner, Shipman & Goodwin LLP	OPM



75 Charter Oak Avenue, Suite 1 - 103, Hartford, CT 06106 T 860.563.0015 ctgreenbank.com

May 10, 2023

Dear Audit, Compliance and Governance (ACG) Committee Members,

We look forward to our meeting on Tuesday, May 16<sup>th</sup> via Microsoft Teams, <u>Click here to join</u> the meeting, from 8:30 a.m. to 9:30 a.m. We will be discussing the following agenda items:

- 1. Employee Handbook Revisions
- 2. Legislative and Regulatory Policy Update
- 3. Update on Statutory Report Status
- 4. BOD Membership Status Update

As always, please let me know if you have any questions.

Sincerely,

Briantan

Brian Farnen General Counsel & Chief Legal Officer



### <u>AGENDA</u>

Audit, Compliance and Governance Committee of the Connecticut Green Bank 75 Charter Oak Avenue, Suite 1-103 Hartford, CT 06106

> Tuesday, May 16, 2023 8:30 – 9:30 a.m.

Staff Invited: Jane Murphy, Brian Farnen, Bryan Garcia, Bert Hunter, Eric Shrago and James Desantos

Others invites:

- 1. Call to order
- 2. Public Comments
- 3. Approve Meeting Minutes\* 5 minutes
- 4. Employee Handbook Revisions\*\* 15 minutes
- 5. Legislative and Regulatory Policy Update 15 minutes
- 6. Update on Statutory Report Status 5 minutes
- 7. BOD Membership Status Update 5 minutes
- 8. Adjourn

\*Denotes item requiring Committee action

\*\* Denotes item requiring Committee action and recommendation to the Board for approval

Join the meeting online at Click here to join the meeting Meeting ID: 223 417 541 99 Passcode: BiFAL9

Or call in using your telephone: Dial <u>+1 860-924-7736</u> Phone Conference ID: 706 494 649#

Next Regular Meeting: October 10, 2023 Connecticut Green Bank, 75 Charter Oak Ave., Suite 1-103, Hartford, CT



### **RESOLUTIONS**

Audit, Compliance and Governance Committee of the Connecticut Green Bank 75 Charter Oak Avenue, Suite 1-103 Hartford, CT 06106

> Tuesday, May 16, 2023 8:30 – 9:30 a.m.

Staff Invited: Jane Murphy, Brian Farnen, Bryan Garcia, Bert Hunter, Eric Shrago and James Desantos

Others invites:

- 1. Call to order
- 2. Public Comments
- 3. Approve Meeting Minutes for January 17, 2023\* 5 minutes

#### Resolution #1:

Motion to approve the minutes of the Audit, Compliance and Governance Committee meeting for January 17, 2023. Second. Discussion. Vote.

4. Employee Handbook Revisions\*\* - 15 minutes – Eric

#### Resolution#2:

**WHEREAS**, pursuant to Section 5.2.1 of the Connecticut Green Bank (Green Bank) Bylaws, the Audit, Compliance, & Governance Committee is charged with the review and approval of, and in its discretion recommendations to the Board of Directors (Board) regarding, all governance and administrative matters affecting the Green Bank, including but not limited to the Green Bank Employee Handbook;

#### NOW, therefore be it:

**RESOLVED**, that the Audit, Compliance & Governance Committee hereby recommends that the Board of the Green Bank approve of the revisions to the Green Bank Employee Handbook presented on May 16, 2023.

- 5. Legislative and Regulatory Policy Update 15 minutes Brian and James
- 6. Update on Statutory Report Status 5 minutes Brian and James
- 7. BOD Membership Status Update 5 minutes Brian
- 8. Adjourn

\*Denotes item requiring Committee action

\*\* Denotes item requiring Committee action and recommendation to the Board for approval

Join the meeting online at Click here to join the meeting Meeting ID: 223 417 541 99 Passcode: BiFAL9

Or call in using your telephone: Dial <u>+1 860-924-7736</u> Phone Conference ID: 706 494 649#

Next Regular Meeting: October 10, 2023 Connecticut Green Bank, 75 Charter Oak Ave., Suite 1-103, Hartford, CT

# **ANNOUNCEMENTS**

- <u>Mute Microphone</u> in order to prevent background noise that disturbs the meeting, if you aren't talking, please mute your microphone or phone.
- <u>Chat Box</u> if you aren't being heard, please use the chat box to raise your hand and ask a question.
- <u>Recording Meeting</u> per Executive Order 7B (i.e., suspension of in-person open meeting requirements), we need to record and post this board meeting.
- <u>State Your Name</u> for those talking, please state your name for the record.



# Audit, Compliance and Governance Committee

May 16, 2023



### ACG Committee Agenda Item #1 Call to Order



### ACG Committee Agenda Item #2 Public Comments





### **Meeting Minutes**

### **Resolution #1:**

Motion to approve the minutes of the Audit, Compliance and Governance Committee meeting for January 17, 2023. Second. Discussion. Vote.



### ACG Committee Agenda Item #4 Employee Handbook Revisions

# **Employee Handbook Revisions**



Green Bank Staff are proposing the following revisions:

### Wording:

- Replacing all references to "CGB" with "Green Bank" to align with the Green Bank's brand guidelines -- (see throughout)
- Replacing all references to "he or she" or "he/she" with "they" or "their" to align with the Green Bank's commitment to BeREADI (belonging, racial equity, access, diversity, and inclusion) -- (see throughout)
- Replacing all references to "President" with "President and CEO" to reflect the accurate position title -- (see throughout)

## **Employee Handbook Revisions**



Green Bank Staff are proposing the following revisions:

### **Policies and Procedures:**

- Clarifying that expense reporting and requests for time off are now automated through SharePoint -- (see pages 26, 31, 50)
- Adding Juneteenth to the list of company holidays as per Public Act 22-128 (see pages 36-37)
- Amending the Educational Assistance Policy to remove the cost per credit hour limit while maintaining the overall maximum of \$10,000 per employee per calendar year -- (see page 42)
- Adding an employee benefit for gym membership -- (see page 44)
- Clarifying that upon an employee's departure from the Green Bank, Green Bank management and its IT consultants may remotely terminate mobile access and associated data. The Green Bank may also restore the device back to its factory settings. -- (see page 71)

## Agenda item #4-Resolution #2



### **Employee Handbook Revisions**

### Resolution#2:

WHEREAS, pursuant to Section 5.2.1 of the Connecticut Green Bank (Green Bank) Bylaws, the Audit, Compliance, & Governance Committee is charged with the review and approval of, and in its discretion recommendations to the Board of Directors (Board) regarding, all governance and administrative matters affecting the Green Bank, including but not limited to the Green Bank Employee Handbook;

### NOW, therefore be it:

**RESOLVED**, that the Audit, Compliance & Governance Committee hereby recommends that the Board of the Green Bank approve of the revisions to the Green Bank Employee Handbook presented on May 16, 2023.



### ACG Committee Agenda Item #5 Legislative and Regulatory Policy Update

## Legislative & Policy Update



 HB 6851: AN ACT IMPLEMENTING RECOMMENDATIONS OF THE HYDROGEN TASK FORCE

Definition of Clean Hydrogen – Industry advocating for Sec. 40315 of Bi-Partisan Infrastructure law Community Benefit Agreements – Passage will give scoring benefit to Regional Hydrogen Hub

 HB 6764: AN ACT CONCERNING A SOLAR UNIFORM CAPACITY TAX AND MODIFICATIONS TO THE STATE'S RENEWABLE ENERGY PROGRAMS Eliminates Property Tax on Solar Systems and creates a uniform tax rate for projects moving forward

# • SB 7: AN ACT STRENGTHENING PROTECTIONS FOR CONNECTICUT'S CONSUMERS OF ENERGY

Omnibus Energy Bill of 2023. Being termed the "Take Back the Grid Act II" – Currently 24 sections Prohibited Cost Recovery, EDC Executive Compensation, PURA study on Standard Service



## Legislative & Policy Update



• SB 961: AN ACT CONCERNING CARBON-FREE SCHOOL REQUIREMENTS FOR NEW SCHOOL CONSTRUCTION AND ESTABLISHING OTHER SCHOOL CONSTRUCTION AND PUBLIC HEALTH REQUIREMENTS FOR SCHOOL DISTRICTS.

Legislation introduced by the Roundtable on Climate & Jobs – Creates new program at Green Bank

Legislation directs \$25 million in GO bonds from the state for the development of the "Public Schools Solar Power Systems and Energy Efficiency Projects Loan Program." to hire staff and to finance energy and solar audits at all of CT's schools.

Green Bank directed to seek available Federal Funding in addition to issuing revenue bonds for the establishment of a revolving loan program to municipalities.

Program aligns with mission of the Green Bank, so we are moderating and facilitating in the development of language that is workable, in the event that this legislation should gain passage.



## Legislative & Policy Update



- HB 6688: AN ACT CONCERNING MORTGAGES, THE RESIDENTIAL HEATING EQUIPMENT FINANCING PROGRAM, THE CONNECTICUT HOUSING FINANCE AUTHORITY AND MOBILE MANUFACTURED HOMES. (Section 4)
- Green Bank Smart-E Program

Expansion of Smart-E qualified products to include "heat pump dryers"

*Currently this can be offered under "other measures" in the Smart-E guidelines* 

Bill Proponent wants to call out product specifically in the legislation (Heating Loan) and programmatically (Smart-E)

Issue that needs to get worked through is the wrong financing program is cited in the legislation and DEEP/Green Bank have concerns about expansion of Heat Loan Program



### ACG Committee Agenda Item #6 Update on Statutory Report Status



## ACG Committee

Agenda Item #7 BOD Membership Status Update

# Current BOD Members Leader House of Rep



- Lonnie Reed (Chair)- Term ends 10/9/2023
- Hank Webster (DEEP; Vice Chair) ex officio
- Brenda Watson (Operation Fuel) Term ends 6/30/23
- Matt Ranelli (Shipman & Goodwin)- Term remains until a successor is appointed & qualified
- Binu Chandy (DECD) ex officio
- Adrienne Farrar Houel Term ends 3/1/25
- \*Laura Hoydick (Mayor Stratford)- term has ended by resignation (OPEN)
- Dominick Grant Term ends 6/30/25
- Joanna Wozniak-Brown (OPM) ex officio
- Bettina Bronisz (OTT) ex officio
- Tom Flynn Term remains until a successor is appointed & qualified
- John Harrity Term remains until a successor is appointed & qualified

# \*Position earmarked for a member with experience in investment fund management is open

\*\*All other positions are currently filled



### ACG Committee Agenda Item #8 Adjourn



### AUDIT, COMPLIANCE AND GOVERNANCE OF THE CONNECTICUT GREEN BANK

Regular Meeting Minutes

Tuesday, January 17, 2023 8:30 a.m. – 9:30 a.m.

A regular meeting of the Board of Directors of the **Connecticut Green Bank (the "Green Bank")** was held on January 17, 2023.

#### Due to COVID-19, all participants joined via the conference call.

Committee Members Present: Thomas Flynn, Matt Ranelli, Lonnie Reed, Joanna Wozniak-Brown

Committee Members Absent: None

Staff Attending: James DeSantos, Brian Farnen, Bert Hunter, Cheryl Lumpkin, Jane Murphy, Ariel Schneider, Eric Shrago, Dan Smith

Others present: None

#### 1. Call to Order

- Thomas Flynn called the meeting to order at 8:56 am due to technical difficulties.
- 2. Public Comments
  - No public comments.
- 3. Approve Meeting Minutes for October 11, 2022

#### Resolution #1

Motion to approve the minutes of the Audit, Compliance, and Governance Committee meeting for October 11, 2022.

Upon a motion made by Matthew Ranelli and seconded by Lonnie Reed, the ACG Committee voted to approve Resolution 1. None opposed or abstained. Motion approved unanimously.

#### 4. Update of Accounting Internal Control Procedures

• Jane Murphy summarized the internal control procedures and proposed updates to all five procedures. All the position titles are being updated to be generic so that as

personnel may change over time, the procedures remain accurate. As well, a change to higher level accounts payable approvals and for electronic payment approvals while the Head of Finance and Administration is absent or on vacation to be allowed by a designee.

- Matthew Ranelli asked if there was clarity in designating the proper signing authority while she may be unavailable, per the proposed changes, in order to remain transparent. Jane Murphy responded there is a group named as Management As A Whole which anyone in that group would be eligible to be a designee but it would still run through the normal control processes otherwise.
- Thomas Flynn asked if the changes have been run by the auditors prior to the request just to verify. Jane Murphy stated no, as she did not believe it to be a substantial change, but she stated she could, and Thomas Flynn agreed that would be a good idea.
- Matthew Ranelli asked if the delegation by Bryan Garcia would be a written delegation for recordkeeping. Jane Murphy clarified the section where it is specified. He reviewed and stated that the wording is a little vague and suggested that it be a written delegation. Jane Murphy agreed to change the procedure for the upcoming Board of Directors meeting,
- Lonnie Reed asked if there is a special training session that would be given for potential designees before they are required to take over. Jane Murphy stated yes there will be but clarified the system is pretty intuitive and reassured that there is no method for any one person to approve singularly.
- Jane Murphy reviewed the proposed changes to no longer require approval by the President and CEO for intercompany cash transfers in order to make processing smoother. She also reviewed a change to remove a redundancy requiring re-approval by the President and CEO when a designee has approved on his behalf.

### Resolution #2

RESOLVED, that the Audit, Compliance and Governance Committee hereby recommends to the Board of Directors for approval the proposed revisions to the Internal Accounting Controls and Procedures as presented and the Committee instructs the Staff to present these proposed changes and the revisions in titles and designees to the auditors to solicit feedback.

Upon a motion made by Matthew Ranelli and seconded by Lonnie Reed, the ACG Committee voted to approve Resolution 2. None opposed or abstained. Motion approved unanimously.

### 5. Legislative and Regulatory Policy Update

- Brian Farnen introduced James DeSantos, a new member of the legal team, and then summarized the current updates to the Legislative session. James DeSantos added the team is open to ideas to present to the General Assembly as the focus on specific policies for this session has not yet been refined. Brian Farnen reviewed the key annual dockets, the largest being the Battery Storage docket.
  - Matthew Ranelli noted that the annual reporting requirements are very important and asked that those requirements continue to be met.
  - Matthew Ranelli asked about the tax issue under the solar tariff and net metering program. Brian Farnen summarized the history of the tax litigation from thirdparty owned systems and stated in relation to over-producing, the previous

energy policy in Connecticut favored on-site use which did not over-produce, but now the new solar tariff policy encourages slight oversizing of onsite PV system. So now there is ambiguity between the clean energy policies and property tax exemption policy as they relate to solar PV. The ambiguity in the statute will likely come to a head as developers are struggling to price out systems due to uncertainty about the taxable status.

#### 6. Review SOC2 Audit Report

• Eric Shrago reviewed what the SOC2 Audit covers and stated that there is no substantial update aside from waiting for the approved report which deems the Green Bank as compliant. He added there are also additional cyber security reviews taking place, but the report so far is looking good.

#### 7. Update on Statutory Report Status

• Brian Farnen stated the statutory report status is currently up to date.

#### 8. Adjourn

Upon a motion made by Lonnie Reed and seconded by Matthew Ranelli, the Audit, Compliance, and Governance Committee Meeting adjourned at 9:30 am.

Respectfully submitted,

Thomas Flynn, Chairperson



# CONNECTICUT GREEN BANK M

# Employee Handbook

Last Update: May 2023October 2021

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**SECTION 1 INTRODUCTION** 

### **Employee Welcome**

Welcome to the Connecticut Green Bank (<u>"Green Bank")CGB</u>! We are pleased that you are joining our staff and embarking on a career with <u>us-CGB</u>. <u>CGBThe Green Bank</u> develops, invests in, and promotes clean sustainable energy sources for the benefit of Connecticut ratepayers. Our most important resource in achieving that vision is you – the employee.– The staff at <u>CGBthe Green Bank</u> works together and depends upon one another to achieve our vision: <u>a planet protected by the love of humanity</u>.– We want you to know how much we appreciate the contribution you are making to the continued successful operation of our agency.

This handbook was developed to describe some of the expectations of our employees and to outline the policies, programs, and benefits available to eligible employees.- These policies and programs are general guidelines under continuous review and are subject to change or discontinuance at any time. -All employees should familiarize themselves with the contents of this handbook, for it will answer many questions about employment at CGBthe Green Bank.

Please read your handbook carefully and keep it for further reference. -Please contact Human Resources if you have any questions or concerns about the information set forth in this handbook.- Again, welcome and we wish you the best in your career at CGBthe Green Bank.

#### Agency Purpose and Structure

The Green Bank was established by the Governor and Connecticut's General Assembly on July 1, 2011, through Public Act 11-80 as a quasi-public agency that superseded the former Connecticut Clean Energy Fund. As the nation's first "Green Bank", the Green Bank leverages public and private funds to drive investment and scale-up clean energy and environmental infrastructure deployment in Connecticut. The Green Bank's statutory purposes are:

- To develop programs to finance and otherwise support clean energy investment in residential, municipal, small business, and larger commercial projects and such other programs as the Green Bank may determine.
- To support financing or other expenditures that promote investment in clean energy sources to foster the growth, development and commercialization of clean energy sources and related enterprises.
- To stimulate demand for clean energy and the deployment of clean energy sources within the state that serves end-use customers in the state.

The Green Bank's purposes are codified in Section 16-245n(d)(1) of the General Statutes of Connecticut and restated in the Green Bank's Board approved Resolution of Purposes.

#### Vision:

A planet protected by the love of humanity.

This statement was inspired by many people including Mary Evelyn Tucker of the Yale Divinity School, the late Mother Jennifer from the Daughters of Mary of the Immaculate Conception, and the late Maya Angelou, particularly her poem "On the Pulse of Morning." This poem speaks to the struggle for social and environmental justice and is as poignant today as it was when it was written. We cannot have environmentalism with humanitarianism.

...a world empowered by the renewable energy of community.

#### Mission:

Confront climate change by increasing and accelerating investment into Connecticut's green economy to create more resilient, healthier, and equitable communities.and provide all of

society a healthier and more prosperous future by increasing and accelerating the flow of private capital into markets that energize the green economy.

#### Goals

To achieve its vision and mission and to demonstrate how Green Bonds Us, the Green Bank has established the following three goals:

- 1. To leverage limited public resources to scale-up and mobilize private capital investment in the green economy of Connecticut.
- 2. To strengthen Connecticut's communities, <u>especially vulnerable communities</u>, by making the benefits of the green economy inclusive and accessible to all individuals, families, and businesses.
- 3. To pursue investment strategies that advance market transformation in green investing while supporting the organization's pursuit of financial sustainability.

The vision, mission, and goals support the implementation of Connecticut's clean energy policies, be they statutorily required (e.g., CGS 16-245ff), planned (e.g., Comprehensive Energy Strategy), or regulatory in nature. For more information about CGBthe Green Bank, please visit www.ctgreenbank.com.

# **Objectives and Scope**

This Employee Handbook has been prepared to acquaint you with policies and procedures relating to employment at CGB<u>the Green Bank</u> and to provide a reasonable understanding of expectations so that staff may work together effectively. -It is a guide to <u>the CGBGreen Bank</u>'s policies, but it does not include every single policy.- All employees are expected to be familiar with and abide by the policies in this Handbook.

This Handbook provides information concerning <u>CGBGreen Bank</u> benefits.- Please note that <u>CGBGreen Bank</u> benefit plans are defined in legal documents such as insurance contracts and official plan texts.- This means that if a question ever arises about the nature and extent of plan benefits or if there is conflicting language, the formal language of the plan documents governs over the <del>any</del>-wording in this Handbook.- Plan documents are available for inspection.

This Handbook is not, nor is it intended to be, an express or implied contract of employment, an agreement for employment for any specified period of time, or a guarantee of benefits or working conditions between an employee and CGBthe Green Bank. – CGBThe Green Bank does not recognize any contract of employment unless it is documented in writing and signed by the employee and the President and CEO. -CGBThe Green Bank reserves the right to unilaterally revise, delete, or add to the policies, procedures, and benefits within this handbook at any time with or without advance notice.- Revisions of policies, procedures, and benefits may be made and applied immediately, prospectively, or, if not prohibited by law, made retroactively to a prior date. -Additionally, CGBthe Green Bank reserves the right to make exceptions or vary from any of the rules, benefits, or policies contained in this handbook at its managerial discretion.

# At Will Statement

Employment with CGBthe Green Bank is at will, which means that either party may terminate the relationship at any time and for any reason, with or without cause. -No manager, supervisor, or other agent of CGBthe Green Bank has the authority to alter the at-will employment relationship by, for example, making a commitment, express or implied, of guaranteed or continued employment to any employee.- An employee's at-will employment status can only be

altered by a written contract of employment that is specific as to all material terms and is signed by both the employee and the President and CEO of CGB the Green Bank.

# Administration of Policy

The President and CEO has overall responsibility for directing the implementation and administration of policies and procedures. On a day-to-day basis, it is the responsibility of the <u>Vice PresidentManaging Director</u> of Operations and each supervisor to administer all policies and procedures in a manner consistent with the handbook.

SECTION 2 EMPLOYMENT

# Orientation

During your first few days of employment, you will participate in an orientation program conducted by Human Resources and various members of CGBthe Green Bank, including your supervisor. -During this program, you will receive important information regarding the performance requirements of your position, basic company policies, your compensation, and benefit programs. -You will be asked to complete all necessary paperwork at this time, such as medical benefit plan enrollment forms, beneficiary designation forms, and appropriate federal and state tax forms. -You will be required to present CGBthe Green Bank with information establishing your identity and your eligibility to work in the United States in accordance with applicable federal law. –During your first few weeks, you may be asked to prepare a short bio and be scheduled to have your photograph taken for inclusion on our website and in our annual report.

Please use this orientation program to familiarize yourself with CGBthe Green Bank and our policies and benefits. -We encourage you to ask any questions you may have so that you will understand all the guidelines that affect and govern your employment relationship with us.

# **Status of Employment**

Employees of CGBthe Green Bank are exempt from classified service as provided in Public Act 11-80 of the Connecticut General Statutes. -Unlike employees in the classified service, CGBGreen Bank employees do not have tenure.- Continued employment is predicated on satisfactory performance of duties, a satisfactory record of attendance, and appropriate conduct with the general public and other employees on the CGBGreen Bank staff as well as continued available work. All CGBGreen Bank employees are considered at-will employees.

# **Conditions of Employment**

All new and rehired employees work on an introductory basis for the first six months after their date of hire.- Acceptance as a regular employee of CGBthe Green Bank is contingent upon successful completion of this introductory period, which is intended to provide the employee the opportunity to demonstrate his/hertheir ability to achieve a satisfactory level of performance and to determine whether the new position meets his/hertheir expectations. CGBThe Green Bank uses this period to evaluate the capabilities, work habits, and overall performance of the new employee.

During the six-month introductory period, if an employee's performance is not satisfactory, the employee may be terminated or may be required to serve an extended introductory period. -Any significant absence (in excess of five consecutive days) will automatically extend an introductory period by the length of the absence.

The existence of the introductory period as described above does not change an employee's atwill status. Employees and <u>CGBthe Green Bank</u> may terminate the employment relationship at any time and for any reason during and after the introductory period.

Additionally, when an employee is promoted or transferred to a new position within <u>CGBthe</u> <u>Green Bank</u>, they will be required to serve another six-month introductory period to assess <u>his/hertheir</u> job performance in the new position... Benefits, eligibility, and employment status <u>areis</u> not changed during a secondary introductory period.

# **Staff Relations**

CGB<u>The Green Bank</u>'s success depends on its employees' skills and abilities and the manner in which they are used to meet our goals. -Our employees are our most important resource to

help us succeed. The Green Bank is committed to free and open communication. -and to improve the way we operate. To take full advantage of this resource we need to communicate freely and openly. Usually, it is the employees performing the work who have the most knowledge about the tasks and processes they use. -We encourage employees to help us by taking every opportunity to make us aware of problems of any kind and suggesting ways we can improve.- Employees should feel free to discuss any concern or suggestions they have with their supervisor or any member of management.- It is our intent that as a result of open communication, CGBthe Green Bank and all of its employees will enjoy a mutually prosperous and satisfying relationship.

Our experience has shown that when employees deal openly and directly with supervisors, the work environment can be excellent, communications can be clear, and attitudes can be positive. When you have a suggestion, question, problem, or concern, your supervisor is in the best position to respond quickly and accurately: <u>Hh</u>owever, you should feel free to discuss the issue with the staff in Human Resources.

The working environment at CGB<u>the Green Bank</u> is one that puts staff, supervisors, and administration in a close relationship of mutual respect. -Attendance at and participation in group meetings and staff meetings is <u>are</u>-important. -Employees are encouraged and expected to use these meetings as opportunities for raising issues to improve client services, program operation, and staff relations. -It is generally during these meetings that most business-related matters are communicated. -If an employee is absent from any of these meetings, it is <u>theirhis</u> or her responsibility to catch up with <u>the</u> business discussed.

# **Customer Service Deliverables**

At <u>CGBthe Green Bank</u>, customer service is a priority. -We all have internal and external customers. -To that end, we expect each one of our employees to be accountable for the following customer deliverables:

- To respond promptly to customer requests for information or assistance.
- To act as a member of the CGBGreen Bank team and pitch in and assist other staff members as requested.
- To provide a work product that is complete, well-organized, and useful to the customer.

# **Equal Employment Opportunity**

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at CGBthe Green Bank will be based on merit, qualifications, abilities in relation to the staffing requirements, and business needs. The CGBGreen Bank is an equal opportunity employer and does not discriminate in employment opportunities or practices on the basis of race, color, religious creed, sex, marital status, national origin, age, ancestry, mental retardation, physical or learning disability, past or present history of mental disorder, sexual orientation, special disabled veterans or veterans of the Vietnam War status, or any other legally protected status, except in those cases where there is a legitimate, compelling and documented occupational qualification that precludes the hiring or promotion of individuals in any of these protected groups. CGBThe Green Bank will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship to CGBthe Green Bank. This equal opportunity policy extends to all aspects of the employment relationship, including recruitment, hiring, training, compensation, promotions/transfers, job assignments, discipline, and termination. -All other policies, such as employee benefits, are also administered based on fair and equal treatment.

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or Human

<u>Resources</u>. -Employees can raise concerns and make reports without fear of reprisal, either verbally or through the grievance procedure. -Anyone engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

# **Disability Policy (ADA)**

As an employer, CGBGreen Bank will not discriminate against any employee or person seeking employment on the basis of a disability, in compliance with the spirit and regulations of the Americans with Disabilities Act (ADA) and all applicable Connecticut laws. -The purpose of the ADA is to assure that individuals with covered disabilities who are able to perform the essential duties of their job, with or without reasonable accommodation, are given equal opportunity and treatment by their employer and fellow employees. -If a qualified employee or employee candidate has an ADA recognized disability; they cannot be denied equal opportunity for employment.

In accordance with the ADA, CGBGreen Bank does not discriminate on the basis of disability in the administration of or access to its programs, services, or activities, and is committed to equal employment opportunity for employees and job applicants with disabilities. Employees who violate the ADA by discriminating against an individual with an ADA recognized disability would be subject to disciplinary action up to and including dismissal. -Rumors and gossip regarding any employee who has an ADA recognized disease or is assumed to have an ADA recognized disease would not be tolerated under any circumstances. -Employees who need a reasonable accommodation must request such accommodations through their supervisor. -Employees may be required to submit medical documentation to support their request.

# Immigration Law Compliance

All job offers extended to successful candidates are contingent upon the receipt of the required documentation and completion of INS Form I-9.

Only those successful applicants who provide the required documentation and complete Form I-9 will be permitted to begin work.

Former employees who are rehired must also complete the form if they have not completed a Form I-9 with CGBGreen Bank within the past three years, or if their previous Form I-9 is no longer available or valid.

# **Conflict of Interest**

This policy establishes the general framework within which CGBGreen Bank wishes the business to operate.

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest and should not have a financial interest in any client. -A conflict of interest may exist when the interests or concerns of any director, officer, staff, client, or said person's relatives, or any party, group, or organization in which said person has an interest or concern, may be seen as competing or conflicting with the interests or concerns of <u>CGBGreen</u> <u>Bank</u>. -No "presumption of guilt" is created by the mere existence of a relationship with outside firms.

The employee concerned must disclose any possible conflict of interest to the President<u>and</u> <u>CEO</u>. -If it is not clear to the employee whether a particular situation or relationship constitutes a conflict of interest, the employee should contact the President<u>and CEO</u>.

When a conflict of interest exists regarding any matter requiring action by the Board of Directors, the President and CEO shall call it to the attention of the Board of Directors (or its committee).

# **Outside Employment**

Employees may hold a job with another company as long as <u>theyhe/she</u> satisfactorily performs their job responsibilities with <u>CGBGreen Bank</u>. –Employees who have additional outside employment for which they receive pay must keep their supervisor and the Human Resources Manager informed of such employment. -This outside employment must not interfere with the employee's effectiveness in performing their job responsibilities and must not conflict with <u>CGBGreen Bank</u>'s public image. -All employees will be judged by the same performance standards and will be subject to <u>CGBGreen Bank</u> scheduling demands, despite any existing outside work requirements.

If the President <u>and CEO</u> and/or <u>his their</u> designee decides that an employee's outside work interferes with performance or the ability to meet the requirements of <u>CGBGreen Bank</u> as they are modified from time to time, the employee may be asked to terminate the outside employment if <u>theyhe or she</u> wishes to remain with <u>CGBGreen Bank</u>. –Inappropriate behavior believed to be a result of outside employment (abuse of sick time, refusal of overtime, unsatisfactory performance, etc.) will be addressed through normal performance management and/or disciplinary procedures.

Outside employment will present a conflict of interest if it has an adverse impact on CGBGreen Bank. –Employees with outside employment must abide by the confidentiality standards that protect CGBGreen Bank's clients.

# **Employment of Relatives**

CGBGreen Bank is committed to the objective treatment of all employees based upon their job performance and the operational needs of CGBGreen Bank. –The employment of relatives may cause serious conflicts and problems with favoritism and employee morale. -In addition, real or apparent partiality in treatment at work and personal conflicts from outside the work environment can be carried into day-to-day working relationships. -Therefore, it is the policy of CGBGreen Bank that relatives of employees will not be considered for employment.

If the relative relationship is established after employment, and there will be a direct reporting relationship or the related individuals will be working within the same department, the parties

may be separated by reassignment or termination, if it is deemed necessary by the Human Resources Department and/or the President\_and CEO and/or his-their\_designee.

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.

# **Confidential Nature of Work**

The protection of confidential information and trade secrets, as defined below, is vital to the interest and the success of CGBGreen Bank. -The improper disclosure of confidential information would harm CGBGreen Bank and/or its employee or clients if such information were improperly disclosed to third parties. -Accordingly, employees may not at any time during and after termination of employment with CGBGreen Bank, use for any purpose or disclose any confidential information to any third person or party, except as specifically authorized in the course of employment and required for carrying out job duties.

Confidential information includes, but is not limited to, the following examples:

- Any work performed by CGBGreen Bank employees for a client, portfolio company, or applicant.
- Any client, portfolio company or applicant information.
- Compensation data, including salary information.
- Personnel information.
- Financial information.
- Pending projects and proposals.
- Any other information not subject to the State Freedom of Information Act.

Confidential information should not be discussed with others (including family and friends), nor should employees discuss office matters or the affairs of clients, portfolio companies, or applicants generally with each other outside the office or any place where they might be overheard, e.g., on the street, in elevators or elevator lobbies, or at lunch counters. -Except when they are certain that it is proper to do so, employees are cautioned against disclosing to callers anything being undertaken by CGBGreen Bank or its employees, clients, companies, or applicants. -Likewise, it is important not to leave confidential information on desks at the end of the day or while a visitor is in the office which would allow easy unauthorized access to such information.

Upon termination of employment with <u>CGBGreen Bank</u> or whenever requested by <u>CGBGreen</u> <u>Bank</u>, employees must promptly deliver to <u>CGBGreen Bank</u> all work product and all documents and other tangible embodiments of the confidential information, and any copies thereof.

The best way to adhere to this policy is to not disclose any information if you are not sure whether such information is confidential information of <u>CGBGreen Bank</u>. –Also, if you have any question as to whether certain information is considered confidential, please consult your department manager.

Violations of this policy may provide grounds for legal action against an employee and may result in disciplinary action up to and including termination, even if the employee does not actually benefit from the disclosed information.

# **Categories of Employment**

It is the intent of CGBGreen Bank to clarify the definitions of employment classifications, so those employees understand their employment status and benefit eligibility.

# **Full-Time Regular Employees**

Employees who are not in a temporary or introductory status and who are regularly scheduled to work a minimum of 40 hours per week are considered full-time regular employees. -Full-time regular employees are eligible for CGBGreen Bank benefits, subject to the terms, conditions, and limitations of each benefit program. Such employees must have successfully completed the six-month introductory period.

# Part-Time Regular Employees

Employees who are not assigned to a temporary or introductory status and who are regularly scheduled to work less than 40 hours per week are considered part-time regular employees. Part-time regular employees receive all legally mandated benefits (such as Social Security and Workers' Compensation Insurance). -Part-time employees who work at least 20 hours per week are generally eligible for other CGBGreen Bank benefit programs on a prorated basis, based on the ratio of their standard hours of work per week to the full-time standard for that position. Such employees must have successfully completed the six-month introductory period.

# **Exempt Employees**

Exempt employees will not receive any overtime pay. -Exempt employees may be granted compensatory time at the discretion of the President <u>and CEO</u> and/or his designee in accordance with the compensatory time policy outlined in Section 4.

# **Non-Exempt Employees**

Non-exempt employees are paid based on the number of hours actually worked and are eligible for overtime pay. -Overtime pay will be paid at the rate of one and one-half times (1½) the non-exempt employee's regular rate of pay for all time worked in excess of 40 hours per week. Overtime pay is based on actual hours worked. -Thus, if a non-exempt employee is absent during a week when overtime hours have occurred, the absent hours reported will not be considered hours worked in determining a time and one-half overtime payment. -An accurate record of non-exempt regular and overtime hours must be maintained for purposes of pay. Time sheets are to be signed by the staff member and by their supervisor, then submitted to Human Resources for processing.

# **Introductory Employees**

Employees who work on an introductory basis as specified in the "Conditions of Employment" are considered introductory employees. Introductory employees who satisfactorily complete the six-month introductory period will be notified of their new employment classification. -Any significant absence will automatically extend the introductory period by the length of the absence. -If an employee changes jobs during the introductory period, a new six-month introductory period shall begin.

# **Temporary Employees**

Employees who are hired as interim replacements to temporarily supplement the work force or to assist in the completion of a specific project are considered temporary employees. Temporary employees hired from temporary agencies for specific assignments are employees of their respective agencies and not <u>CGBGreen Bank</u>. –Employment assignments in this category are of a limited duration. -Employment beyond any initially stated period does not in any way imply a change in employment status.

# Consultants

Those independent contractors who are on contract to provide services to CGBGreen Bank. Persons in this category are not CGBGreen Bank employees.

# **Selection Process, Interviewing and Hiring**

The President and CEO and/or their his designee must approve all new positions or changes to existing position descriptions. Vacant positions to be filled may be posted internally and, if necessary, posted externally. -The immediate supervisor, the President and CEO, any manager or director within CGBGreen Bank, and/or any person the President and CEO designates, may

be involved in the interview selection process. -The President<u>and CEO</u> has the ultimate responsibility for appointing the candidate to the position.

CGBGreen Bank, through the actions and approval of the President and CEO, reserves the right to transfer or reclassify positions and employees within CGBGreen Bank and restructure their job duties and position without going through the above public process when it is in the best interest of CGBGreen Bank.

# **Promotion Policy**

CGBGreen Bank is committed to providing employees with opportunities for career advancement. -Employees may apply for posted positions for which they are qualified, provided any such position represents a promotion or advancement.

CGB<u>Green Bank</u> is committed to implementing a fair and equitable "in-house" promotion policy that will aid in the development of staff to their fullest potential. Full and equal opportunity will be extended to all employees in accordance with CGB<u>Green Bank</u>'s affirmative action plan.

There is an established career path for most positions within <u>the CGBGreen Bank</u>. The career path progression for each position can be found in the job description for that position. If an employee is being promoted within the established career path and within their department, such promotion can be made without posting the position. -A current employee shall be eligible for reclassification or promotion to an existing or new position only if such employee has at least six months of service with the Green Bank and meets the minimum qualifications for such position.

If the position is not within the established career path progression, the position will be posted, and the selection process outlined above will be followed.

# **Employment Applications**

CGB<u>Green Bank</u> relies upon the accuracy of information contained in the employment application, as well as the accuracy of other data presented through the hiring process and employment. -Any misrepresentations, falsifications, or material omissions in any of this information or data may result in CGBGreen Bank exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment.

# **Employment Reference Checks**

CGBGreen Bank wishes to ensure that applicants are qualified and have a strong potential to be productive and successful. It is the policy of the CGBGreen Bank to check the employment references of all applicants, and no offer of employment can be made until Human Resources has received satisfactory reference checks.

Human Resources will respond to all reference check inquiries from other employers only with the approval of the employee or past employee and in accordance with applicable law.

# Performance Management and Review

CGBGreen Bank has a performance management and review process. -The objectives of this process are to:

- Provide clear communication between the supervisor and employee.
- Identify the employee's work objectives and expected results.
- Identify the employee's performance strengths and weaknesses.
- Assess the need for training.
- Aid in decisions about future work assignments.

- Determine the employee's suitability for continued employment.
- Determine the employee's eligibility to receive a merit compensation award.

CGBGreen Bank believes that all employees should receive prompt, thorough feedback regarding their performance. -Formal performance assessments for new hires and newly promoted employees are conducted at the completion of their six-month introductory employment period. -Once an employee has received the performance assessment of their introductory employment period, formal written performance appraisals are conducted annually. Performance evaluations provide employees with the opportunity to express any concerns they have about their jobs, career aspirations, and future with the CGBGreen Bank. –If an employee is having difficulty in their job, interim evaluations may be conducted to help the employee understand what performance improvements are needed.

All performance assessments are reviewed by the appropriate department head, the President and CEO and/or his-their designee, and Human Resources.

# **Personnel Files**

CGBGreen Bank maintains a confidential personnel file on each employee. -The personnel file includes such information as the employee's job application, resume, records of training, documentation of performance appraisals and salary increases, written warnings or reprimands, and written commendations. -Personnel files are the property of CGBthe Green Bank, and access to the information they contain is restricted. -Generally, only supervisors and management personnel of CGBGreen Bank who have a legitimate reason to review information in a file are allowed to do so unless otherwise required by law.

Employees will be notified when information is added to their personnel file.

Employees who wish to review their own files should contact Human Resources. With reasonable advance notice, employees may review their own personnel file in the Human Resources Office in the presence of a Human Resources employee.

# **Updating Personnel Records**

Employees must notify Human Resources of any changes in personal mailing addresses, telephone numbers, number and names of dependents, individuals to be contacted in the event of an emergency, etc.

It is the responsibility of each individual employee to promptly notify CGBGreen Bank of any such changes in personnel status.

It is also the responsibility of each individual employee to review bi-weekly payroll deductions (tax withholding, FICA, etc.) for accuracy and report any errors promptly to Human Resources.

SECTION 3 WAGES AND SALARY ADMINISTRATION

# **General Policy**

It is the policy of CGB<u>the Green Bank</u> to maintain a fair compensation program that provides equitable payment for work performed, is competitive with the identified labor market, and ensures compliance with federal and state legislation.

A salary range has been assigned to each position.- The compensation for each employee shall be within the minimum and maximum of the range established for the grade to which the position has been assigned. –In rare instances, the President and CEO may approve a salary outside the range for a specific position. -Periodically, CGBthe Green Bank may revise job descriptions, evaluate individual jobs to ensure they are being compensated appropriately, and review job specifications as business needs dictate. -Salary ranges may also be adjusted for annual inflation at the discretion of the Board of Director's Budget, and Operations, and Compensation Committee.

# Hours of Work

The standard workweek for full-time regular employees is currently a minimum of 40 hours. Regular daily work hours are from 8:00 a.m. to 5:00 p.m. Monday through Friday. -Where workload or schedules require, some departments may operate outside these regular hours. Supervisors should notify employees of their work schedule. -Each employee is responsible for informing Human Resources of any permanent change in their usual work hours.

# **Flexible Time**

Under the flextime policy, an employee may be permitted to start and end the workday at times that differ from the standard hours of operation.

Flextime schedules are at the discretion of management and must be approved in advance by the employee's supervisor and the Department Head.

Employees participating in flextime must have regular daily starting and quitting times that do not vary from day to day. -All full-time regular employees must be at work during the core hours of 9:00 a.m. to 3:30 p.m. No flextime schedules shall begin before 7:00 a.m., or end later than 6:00 p.m.

All employees participating in flextime must work their full scheduled hours per day and take at least a one half-hour lunch break.

# **Pay Periods**

Staff members are paid on a bi-weekly basis. Each paycheck will include earnings for all work performed through the end of the previous payroll. Thus, a new employee can expect to receive <u>his/hertheir</u> paycheck up to four weeks from the first day <u>they he/she</u> commenced work for <u>the CGBGreen Bank</u>. -Employees may have pay directly deposited into their bank accounts if they provide advance written authorization. Direct deposit applications may be obtained from Human Resources.

Employees will receive an itemized statement of wages for each pay period. -For those employees not participating in Direct Deposit, paychecks will be distributed directly to the staff member after 3:00 p.m. every other Thursday. -All paychecks not distributed by the end of the business day will be returned to Human Resources. -If a staff member is absent from work and desires other arrangements to receive their paycheck, <u>they\_he/she</u>-will have to contact Human Resources directly to make such arrangements.

#### **Lunch Periods**

Employees are generally entitled to a one (1) hour lunch period. -All employees must take a minimum of a half-hour for lunch. -Scheduling of lunch periods is between the hours of 12:00 P.M. and 2:00 P.M. -Lunch hours should be scheduled so that there is coverage at all times, and employees who work in tandem with other employees should coordinate the schedule of their lunch hours. If employees must attend to personal business during the workday, they should do so during their scheduled lunch break period. Employees should not work through their lunch period in order to leave early without prior authorization from their supervisor.

### **Time Sheets**

CGBGreen Bank participates in self-service time reporting to the State of Connecticut's payroll system, <u>Core-CTCORE</u>. -Accurately recording time worked is the responsibility of every employee. -Time worked is all the time actually spent on the job performing assigned duties. Time sheets must be accurately filled out in accordance with <u>Core-CTCORE</u> time reporting guidelines and approved by the supervisor.- Each employee shall personally record <u>their his or her</u>-own time, which includes the time they begin and end work and any time that is charged against their leave balances (personal time, vacation time, sick time, etc.). Altering, falsifying, tampering with time records, or recording time on another employee's time sheet may result in disciplinary action, up to and including termination of employment.

Employee time sheets for each two-week pay period must be completed in <u>Core-CT-CORE</u> by noon on the Friday after the pay period.- All time sheets must be approved and initialed by the employee's supervisor, including any corrections and backup.- Working time is logged in 15 minutes increments. -Non-exempt employees, who report to work more than seven minutes late, but less than 15 minutes, must log their starting time at 15 minutes after the normal starting time. -Time lost due to reporting to work late may not be made up by staying late at the end of the day or working through lunch periods, unless the employee obtains the prior authorization of his/hertheir supervisor.

# **Attendance and Punctuality**

The ability of <u>CGBGreen Bank</u> to operate smoothly and efficiently depends on regular attendance and punctuality. -Absenteeism and tardiness are disruptive and place a burden on other employees.- To maintain a productive work environment, <u>CGBGreen Bank</u> expects employees to be consistently reliable and punctual in reporting for work.

In the rare instances when employees cannot avoid being late to work or are unable to work as scheduled, they should personally notify their supervisor before the anticipated tardiness or absence. If the supervisor is not available, employees should notify the Human Resources Manager so that <u>they he/she</u>-can arrange for coverage during the absence. -Employees should also inform their supervisor or the Human Resources Manager of the reason for their tardiness or absence. In case of an emergency where advance notification is not possible, employees must report the absence or tardiness as soon as possible.

An employee's supervisor is responsible for monitoring an employee's attendance.- The supervisor should deal with abuses of reporting time. -Occurrences of abuse should result in counseling of the employee by the supervisor. -Supervisors and Human Resources will monitor unscheduled occasions of absence and Human Resources will determine the action to be taken upon the accumulation of a certain number of unscheduled occasions of absence within a given time period, taking into consideration the following:

- Numbers of days taken.
- The number of unscheduled occasions of absence.
- The pattern of absences.

- The employee's past records.
- The reasons for the unscheduled occasions of absence.

Although the specific action taken in each instance will be determined by Human Resources in its discretion, the chart below illustrates the actions likely to be taken upon the accumulation of a certain number of unscheduled occasions of absence within a given time period.

Number of Occasions	Within this Time Period	Action Likely to Be Taken
3	3 months	Your attendance record will be reviewed with you to determine contributing problems and possible solutions.
5	6 months	Your attendance record will be reviewed with you to determine contributing problems and possible solutions AND this counseling session will be recorded in a written memo, a copy of which will be maintained in your personnel file.
9	12 months	Your attendance record will be reviewed with you to determine contributing problems and possible solutions AND this discussion will be documented and a copy will be maintained in your personnel file.
		An "Unsatisfactory" or "Below Threshold" performance appraisal will be given to you for unsatisfactory attendance and dependability unless you give your supervisor documentation explaining the occasions to <u>his/hertheir</u> satisfactionYou will also be notified that receiving two "Unsatisfactory" or "Below Threshold" performance appraisals in a row (for poor attendance or any other reason) is just cause for dismissal.

Poor attendance and excessive tardiness, including failing to report the same in a timely manner, may lead to disciplinary action, up to and including termination of employment. -For example, an employee who does not report to work and who has not notified their supervisor of this absence may be terminated unless an acceptable explanation is provided for both the absence and the failure to report.

# Absence from the Office

If an employee must be out of the office for business or personal matters, the supervisor must be advised <u>and a formal request should be submitted via SharePoint</u>. -The employee also should make every attempt to keep their schedule up to date on their Outlook Calendar. -If the supervisor is not available, the appropriate department head or the President <u>and CEO</u> and/or <u>his-their</u> designee should be notified. -Employees who are working outside the office at meetings or other events should leave a telephone number where they can be reached. -These employees are also responsible for checking in and receiving messages.

# Procedures for Absences from the office

- 1. Pre-schedule all vacation time use. -Vacation leave shall be requested as far in advance as possible and is subject to CGBGreen Bank's operating needs.
- 2. Pre-schedule all absences, if possible. -You should attempt to schedule all absences (including late arrivals and early departures) in advance with your supervisor.- Pre-scheduled and approved use of sick and other types of leave, such as vacation, a doctor's visit, or a funeral, will not be counted as an unscheduled occasion of absence.
- 3. Unscheduled absences. -If it is not possible to pre-schedule an absence (including a late arrival or early departure), you must:
  - $\circ$  notify your supervisor within a  $\frac{1}{2}$  hour of the start of the workday.
  - give the reason for the absence.
  - o give an estimate of how long the absence will be.

If the absence is continuous or lengthy, notify your supervisor on a daily basis, or as otherwise required by your supervisor.

- 4. Exhaustion of sick leave accruals.- If you are absent because of illness or injury, but have exhausted your sick leave accruals, you must:
  - For each absence, have your physician complete a state medical certificate form explaining the reason for your absence, and submit the completed form to Human Resources.
  - If you wish to use other accrued leave in place of your exhausted sick leave, you
    must make such a request in writing and submit it to your supervisor or to Human
    Resources with the completed medical certificate form.
  - If you fail to follow this procedure, you will be charged with an unscheduled occasion of absence and unauthorized leave for the day.
  - If you have exhausted all other accrued leave time in addition to your sick leave time, you will be charged with unauthorized leave for the day.
- 5. Extended Leaves. -If you will be absent for an extended period of time because you are sick or injured, you must:
  - Obtain a medical certificate form from Human Resources.
  - Have the form completed by the treating physician stating the reason for the absence and your anticipated return to work date.
  - Return the form to Human Resources at the time you return to work.

# Telecommuting

To attract and retain the best workforce to accomplish the mission of Connecticut Green Bank, we offer the option for employees to telecommute. Telecommuting is a management option that allows an employee to work at home or an alternate work site; it is not an employee entitlement. The purpose of telecommuting as outlined in Connecticut General Statute 5-248i(a) is to: (1) Increase worker efficiency and productivity; (2) benefit the environment; and (3) reduce traffic congestion. Telecommuting does not change the hours of work.- An employee may be considered for this option when the following minimum criteria are met:

- 1. In most instances, the employee must have completed their introductory period and have been performing his/hertheir current job duties for at least 60 days.
- 2. The employee has requested to telecommute by completing a telecommuting agreement on SharePoint which will outline the terms and conditions of their telecommuting arrangement.
- 3. CGB<u>Green Bank</u> has determined that the employee's job can be readily and effectively completed at an alternate site.
- CGB<u>Green Bank</u> determines that the employee's absence from the office is not detrimental to office operations, overall productivity, the working conditions of other employees, or services to clients and customers.
- 5. The employee's performance has been satisfactory or better.

6. The employee agrees to abide by the guidelines of the Telecommuting Policy outlined in their telecommuting agreement.

The Green Bank provides a flexible and customized telecommuting option for all its employees. The general guidelines are as follows:

- A request to telecommute one or two days a week or for inclement weather is automatically approved
- Any request that exceeds two days a week will require a written justification from the employee and approval from the <u>President and</u> CEO. Your telecommuting days do not have to be consistent every week, and you are responsible for identifying those days you are working remotely on your Outlook calendar.
- You are responsible for forwarding your telephone at all times when telecommuting and coming into the office as needed for meetings, seminars, etc.

# **Overtime and Overtime Pay**

Under the federal Fair Labor Standards Act (FLSA), employees who are covered by FLSA shall be paid time-and-one-half for all hours worked in excess of 40 hours per week. Each position at CGBGreen Bank is determined to be exempt or non-exempt in consultation with the President and CEO, Operations staff, and CGBGreen Bank's attorneys.- Exempt employees will not receive any overtime pay. Non-exempt employees are paid based on the number of hours actually worked and are eligible for overtime pay based on actual hours worked. -Thus, if a non-exempt employee is absent during a week when overtime hours have occurred, the absent hours reported will not be considered hours worked in determining overtime payment. -An accurate record of non-exempt regular and overtime hours must be maintained for purposes of pay. -Time sheets are to be submitted by the staff member and reviewed and approved by their supervisor through Core\_CT for processing.

# **Merit Compensation**

On an annual basis, the President and CEO may recommend for approval by the Board of Directors an allocation of funds for merit compensation increases for the staff. -A maximum percentage salary increase will be set by the President and CEO for those employees with exceptional performance evaluations. -Employees shall be compensated according to job performance as determined through the performance management process as administered by CGBthe Green Bank.

SECTION 4 TYPES OF LEAVE

# **Vacation Policy**

Regular full-time employees will accrue and must use vacation time in accordance with the following schedule:

Years of Service	Vacation Earned	Must Use Annually
0 - 2 years	15 days per year	10 days
2 - 10 years	20 days per year	15 days
Over 10 years	25 days per year	20 days

Vacation time is paid at the employee's base pay rate.- The maximum number of vacation days an employee will be eligible to earn annually will be 25 days. Generally, an employee may not take more than four (4) consecutive weeks at one time in one year. Under extraordinary circumstances, the President and CEO and/or his-their designee may grant exceptions.

All employees will be limited to a maximum carryover annually of 5 days (40 hours) of vacation time accrued during the calendar year. In extraordinary circumstances, such as unusual work circumstances, deadlines, or demands, the President and CEO may increase the allowable annual carryover to ten (10) days. -The additional time that is carried over must be used during the next calendar year, in addition to all other vacation time required to be used during that calendar year as outlined in the grid above.

#### Maximum Aggregate Carryover

The maximum aggregate vacation balance permitted to be carried into a new calendar year for employees hired after January 1, 1998, including all vacation hours previously accrued shall be 30 days (240 hours). With approval, the President and 4CEO may allow a one-time exception to carryover vacation in excess of 30 days (240 hours) into a new calendar year. If the exception is granted, the employee's vacation balance must be at 30 days (240 hours) by December 31<sup>st</sup> of the new calendar year. Vacation accruals above this amount will be automatically reduced to the maximum aggregate carryover of 30 days/240 hours and all unused vacation time over 30 days (240 hours) will be forfeited.

Employees will be allowed to accrue more than this amount during a given year, however, the maximum aggregate accrual for which an employee will be compensated upon separation is 240 hours. -In the event of an involuntary termination where the employee is not given the opportunity to utilize their vacation balance over 240 hours prior to separation, the effective date of the termination will be adjusted to incorporate the employee's unused vacation time over 240 hours and the employee will be paid out in a lump sum for the remaining balance of 240 hours.

#### Maximum Vacation Hours Paid Out Due to Termination/Resignation

The maximum number of vacation days/hours to be paid upon termination/resignation for employees hired after January 1, 1998 shall be 30 days/240 hours. The maximum for employees hired prior to January 1, 1998 shall be 120 days/960 hours.

#### **Advancing Vacation Time**

Vacation time will not be advanced under any circumstances.- If an employee wishes to take vacation time, but does not have accrued time available, they may request to take unpaid leave. Such leave may be granted at the discretion of the employee's supervisor and or/ the department head.

\*Note – Once an employee is at the maximum vacation balance of 30 days, they must utilize all of their annual accruals or forfeit them.

# **Accrual Period**

Vacation days are accrued and credited on a monthly basis and can be taken when earned. Employees begin to accrue vacation days the first full month after their date of hire. -However, vacation is not earned in any calendar month in which an employee is on leave of absence without pay for more than five working days.

# Scheduling

To the extent possible, and with sufficient advance notice, vacations will be scheduled as requested by the employee provided that staffing requirements be met as determined by the supervisor. -The supervisor will settle conflicts between employees with regard to desired vacation schedules.

A written or electronic request should be filled out by the employee in SharePoint and approved by the Supervisor. -Whenever possible, if requesting less than one week of vacation, the request should be presented three days prior to the time requested and if requesting one week or more the request should be presented and approved at least three weeks prior to leave.

# **Compensatory Time**

The President<u>and CEO</u> and/or <u>theirhis</u> designee may grant compensatory time for extra time worked by exempt employees, excluding members of the senior management team, for these unique situations provided it conforms to the following criteria:

- As a general rule, exempt employees at CGBGreen Bank work 40 hours per week. However, these employees are expected to work the number of hours necessary to get the job done. -There are some occasions that require an exempt employee to work a significant number of extra hours in addition to the normal work schedule. This does not include the extra hour or two a manager might work to complete normal work assignments in a normally scheduled workday.
- 2. The Senior Management Team is defined as those exempt employees with a direct reporting relationship to the President and CEO and are at a level of Director or above.
- 3. The exempt employee must receive written authorization in advance to work extra time by the President and CEO and/or their his designee in order to record the extra hours as compensatory time. The authorization must include the employee's name and outline the reason(s) for compensatory time. Proof of advance authorization must be retained for audit purposes.
- 4. The amount of extra time worked must be significant in terms of total and duration and occur on weekends or state holidays.
- 5. Extra time worked must be completed at an approved work location.
- 6. Compensatory time shall <u>not</u> accumulate by omitting lunch hours or other changes that do not extend the exempt employee's normal workday.
- 7. Compensatory time shall not accumulate for travel or commuting purposes.
- The number of extra hours worked and the compensatory time taken must be recorded on the appropriate time sheet and maintained by CGBGreen Bank. -In no case shall an exempt employee be permitted to take compensatory time before it is earned.
- 9. All compensatory time earned January 1 through June 30 will expire on December 31 of the same year, and compensatory time earned July 1 through December 31 will expire on June 30 of the following year. -All compensatory time balances will be set to zero on these dates. Any time not used by these dates will not be available.
- 10. In no event will compensatory time be used as the basis for additional compensation and shall not be paid as a lump sum at termination of employment.
- 11. No more than 8 hours can be earned in a twenty-four hour period.

# **Personal Leave**

All CGBGreen Bank full time employees are granted three days paid personal leave each calendar year for purposes not covered by vacation or sick leave. -Personal days do not require prior approval of the employee's supervisor; however, employees should still notify their supervisor with as much notice as possible. -Personal time may not be accumulated or carried over to the next calendar year. -Employees will not be compensated for unused personal time upon termination of employment. -Personal leave days for part\_-time employees will be prorated.

### **General Leave of Absence**

Occasionally, an employee may request time off without pay for reasons not covered by any of the other policies. -In these cases, the employee should submit a written request for a leave of absence to their manager with a copy to the President and CEO and/or their his designee. -The request should clearly state the reason for the request and provide any supporting information to aid in the approval decision. The reason, and the requested length of the leave, will be considered by the President and CEO in his/hertheir decision as to whether the employee's medical and other insurance benefits should continue during the leave, if approved. The decision will also be influenced by any limitations imposed by individual insurers.

#### **Bereavement Leave**

CGBGreen Bank will grant an employee up to five consecutive workdays off in the event theirhis or her immediate family member dies. -If a death occurs while the employee is on vacation, five days absence with pay may be granted in lieu of the employee's vacation period. -The immediate family is defined as an employee's spouse, parent, brother, sister, child, grandparent, grandchild, in-law, legal guardian, or permanent resident of the employee's household. Additional time may be granted if approved by the supervisor and charged against vacation or personal time. -Employees should notify their supervisor as soon as possible if they have a need for bereavement leave.

#### **Sick Leave**

Full-time employees earn 10 sick leave days per year. Part-time employees earn sick leave according to the same schedule as full-time employees but prorated according to their standard part-time hours per week. Sick time is not earned in any calendar month in which an employee is on leave of absence without pay more than five working days.

Sick leave is intended for use in situations such as the following:

- Family illness the event of a critical illness or severe injury to a member of the employee's immediate family in which the assistance of the employee is required.
- Medical Appointments for medical, dental, eye examinations, or treatment for which arrangements cannot be made outside of working hours
- Other bereavement up to three days per calendar year to attend the funeral of persons other than those of the employees' immediate family.

Terminating employees will not be compensated for the balance of unused sick leave except in the case of retiring employees. -Qualified retirees will receive payment for one-quarter of accumulated unused sick leave up to a maximum of 60 days.

# Sick Leave - Medical Certification or Examination

CGBGreen Bank may require certification of illness from an employee's physician or a medical examination with another physician to verify the need for continued absence. To be certain that an employee's health permits their his or her safe return to work, CGBthe Green Bank may require medical certification or an examination by a physician regarding fitness for duty.

An acceptable medical certificate, signed by a licensed physician or other health care provider, will be required to substantiate time off if the medical/sick leave:

- Consists of more than five consecutive working days.
- Is to be applied contiguous to, or in lieu of, time taken off as vacation.
- Recurs frequently or habitually, and the employee has been notified.
- When the employee's presence at work will expose others to a contagious disease.

#### Sick Leave Bank

The <u>CGBGreen Bank</u> Sick Leave Bank is a pool of sick days that has been established by employees of <u>CGBGreen Bank</u> who have made a donation of their accumulated sick days. The Bank is available to members to draw up to ten (10) eight- hour sick days per year in the unfortunate event that they experience a qualified illness or injury.

Sick Leave Bank members will receive benefits in the form of paid sick leave if all of the following requirements are met:

- the member has a medical condition that prevents them from working that has been verified by a Medical Certificate OR a member's immediate family member has a medical condition that has been verified by a Medical Certificate and requires the Sick Leave Bank member's care.
- the member has been out on approved medical leave (paid or unpaid) as described above for at least two consecutive weeks.
- the member has exhausted all of their sick, personal leave and compensatory time and vacation time in excess of 30 days.
- the member has not been disciplined for an absence-related reason for the past 12 months (however a committee comprised of HR and Management may waive this requirement).
- the member has completed a Sick Leave Bank Withdrawal Request Form and it has been approved by human resources.

All requests for utilization of the sick leave bank must be in accordance with the Sick Leave Bank Policy.- Please contact Human Resources for a complete copy of the Sick Leave Bank policy.

# **Family Medical Leave**

# Purpose

This policy establishes guidelines for leave available to employees of CGBGreen Bank under the federal Family and Medical Leave Act of 1993 ("FMLA") and highlights relevant provisions of Connecticut law.

# Eligibility

Employees who have worked at <u>CGBGreen Bank</u> for at least twelve (12) months, and who have worked at least 1,250 actual work hours during the twelve (12) months immediately preceding the start of a leave, are eligible for unpaid leave under the FMLA. ("Hours worked" does <u>not</u> include time spent on paid or unpaid leave). Employees must have worked at <u>CGBGreen Bank</u> for at least six (6) months to be eligible for family/medical leave under Connecticut law.

# **Reasons for Leave**

Leaves under either the state family/medical leave or federal FMLA or a combination of the acts may be taken for the following reasons:

- The birth of employee's child or adoption of a child by the employee (both).
- The placement of a foster child with the employee (federal only).
- The "serious illness" (state) or "serious health condition" (federal) of a child, spouse, or parent of an employee.
- The "serious illness" (state) or "serious health condition" (federal) of the employee.

# **Family Medical Leave Documentation Requirement**

The following documents must be submitted in support of an FMLA request:

- **Birth of child:** "Employee Request" (Form HR-1) and Medical Certificate (Form P-33A-Employee) indicating the pre-delivery disability period (if applicable), delivery date and post-partum disability period (if applicable).
- Adoption: (both state and federal) or foster care (federal only) of child: "Employee Request" (Form HR-1) and letter from the adoption/foster care agency confirming the event and its effective date.
- Serious illness/health condition of child, spouse, or parent: "Employee Request" (Form HR-1) and Medical Certificate (Form P-33B-Caregiver).
- Serious illness/health condition of employee: "Employee Request" (Form HR-1) and Medical Certificate (Form P-33A-Employee) (only if employee is on paid or unpaid leave for more than five days).

# Length of Leave

Under federal FMLA, employees are entitled to 12 weeks of unpaid leave in a twelve-month period. Under state family/medical leave, employees are entitled to a maximum of twenty-four (24) weeks of unpaid leave within a two-year period. The state entitlement is applied <u>after</u> the employee has exhausted any sick leave accruals that may be applicable. The state policy allows the substitution of personal leave and vacation accruals; however, this will not extend the 24-week entitlement period.

The 12-month entitlement period for family or medical leave is measured from the initial date of an employee's first leave under this policy, until the end of the applicable 12 or 24-month period. For leaves eligible under both the FMLA and state family/medical leave, the entitlement periods will run concurrently.

# **Requests for Leave**

Requests for a family or medical leave must be submitted to Human Resources at least thirty (30) days before the leave is to commence, if possible. If thirty (30) days' notice is not possible, please submit your request as soon as practicable under the circumstances. For leaves taken because of the employee's or a family member's serious health condition, the employee must

submit a completed medical certification form before the leave begins, if possible. This form may be obtained from Human Resources. If advance certification is not possible, the employee must provide the medical certification within fifteen (15) calendar days of the employer's request for the medical certification. Failure to submit a certification, or submission of an incomplete certification, may delay the use of FMLA leaves, or result in denial of such leave. If an employee takes leave to care for <u>their his or her</u> own serious health condition, immediately upon return to work the employee must provide medical certification that the health condition which created the need for the leave no longer renders the employee unable to perform the functions of the job. This certification must be submitted to Human Resources.

# **Use of Paid Leave**

Employees have the option of substituting their accrued paid personal leave and accrued paid vacation for any unpaid portions of federal FMLA taken for any reason other than the employee's own serious health condition. However, where the leave is for the employee's own serious health condition, accrued paid sick leave shall be substituted for unpaid portions of federal FMLA prior to the employee electing the substitution of accrued paid personal and accrued paid vacation leave. The amount of unpaid leave entitlement is reduced by the amount of paid leave that is substituted.

# **Medical Insurance and Other Benefits**

During approved FMLA and/or state family/medical leaves of absence, CGBGreen Bank will continue to pay its portion of medical insurance premiums for the period of unpaid family or medical leave. The employee must continue to pay their share of the premium and failure to do so may result in loss of coverage. If the employee does not return to work after expiration of FMLA leave, the employee will be required to reimburse CGBGreen Bank for payment of medical insurance premiums during the family or medical leave, unless the employee does not return because of a serious health condition or other circumstances beyond the employee's control.

Employees who have state-sponsored group life insurance will be billed directly for the same amount they contributed prior to the leave. In the case of any other deductions being made from paychecks (disability insurance, life insurance, deferred compensation, credit union loans, etc.), employees must deal directly with the appropriate vendor to discuss payment options.

During a leave, an employee shall not accrue employment benefits such as seniority, pension benefit credits, sick, or vacation leave. However, employment benefits accrued by the employee up to the day on which the leave begins, which remain unused at the end of the leave, will not be lost upon return to work. Leave taken under this policy does not constitute an absence under CGBGreen Bank's attendance policy.

# Reinstatement

Except for circumstances unrelated to the taking of a family/medical leave, an employee who returns to work following the expiration of a family/medical leave is entitled to return to the job held prior to the leave or to an equivalent position with equivalent pay and benefits. In cases involving the serious health condition of an employee, CGBGreen Bank will require the employee to produce a fitness-for-duty report on which the physician has certified the employee is able to return to work. This requirement protects the employee, co-workers and the public from the negative consequences that can result when an individual returns to work before being medically ready to do so. Therefore, employees who are notified of the need for a fitness-for-duty certification will not be allowed to return to work without it.

# **Military Leave**

Military leave with pay for required military training is available to members of the National Guard or Reserve components of the Armed Forces. -Required military leave must be verified through the submission of a copy of the appropriate military orders to Human Resources. A maximum of three (3) weeks per calendar year is allowed for annual field training.

When an employee is ordered to duty at the expiration of <u>his/hertheir</u> field training, as evidenced by special orders, <u>they\_he/she</u>-shall receive additional time off with pay provided the period of absence in any calendar year shall not exceed thirty (30) days. –No such employee shall be subjected, by reason of such absence, to any loss or reduction of vacation or holiday privileges.

# **Extended Military Leave (Induction)**

Any employee who shall enter the Armed Forces shall be entitled to a leave of absence without pay for the time served in such service, plus ninety (90) days. -An employee who leaves employment for the purpose of entering the Armed Forces of the United States shall be reinstated to their former position and duties, providing <u>theyhe/she</u> apply for return to employment within ninety (90) days after receiving a certificate of satisfactory service from the Armed Forces.

This section shall not apply to any employee who has been absent from <u>his/hertheir</u> employment for a period of more than three (3) years in addition to war service or compulsory service and the ninety (90) day period provided for because of voluntary reenlistment.

# **Jury Duty**

CGB<u>Green Bank</u> recognizes that every citizen has an obligation to perform jury duty when required. CGB<u>Green Bank</u> encourages cooperation of its employees with this important civic duty.

If an employee is notified to appear in court to qualify to serve as a juror, the staff member must inform Human Resources by presenting the notice in advance of the court appearance date. The employee will receive time off to serve and will receive <u>his/hertheir</u> regular salary during the period of jury service.

Failure to provide such notice will result in <u>CGBGreen Bank</u> charging that time to either personal or vacation leave.

On any day during which the employee's attendance on the jury is not required, <u>they he/she</u> shall report to work as usual. -On any day in which the court releases jurors before 1:00 p.m., the employee is expected to report to work for the balance of the day.

# **Holidays**

Holiday time off will be granted to all full-time regular employees on the <u>1342</u> holidays listed below.

Part-time employees will be paid only if they are scheduled to work on the date that the holiday falls and their pay for the holiday shall be pro-rated based on their part-time schedule. Temporary employees after ninety (90) days will receive holiday pay if normally scheduled to work on the day of the week on which the holiday falls.

If a recognized holiday falls during an eligible employee's paid absence (e.g., vacation or sick leave), holiday pay will be provided instead of the paid time off benefit that would otherwise have applied.

Paid holidays at CGBGreen Bank are as follows:

New Year's Day Martin Luther King's Birthday Lincoln's Birthday Washington's Birthday Good Friday Memorial Day Juneteenth Independence Day Labor Day Columbus Day Veteran's Day Thanksgiving Day Christmas Day

#### **Inclement Weather**

When traveling in snow presents a significant danger to staff and clients, cancellations and late openings for the State of Connecticut will be announced on WTIC-AM 1080 or on-line at the Connecticut Department of Emergency Management and Homeland Security website. The President and CEO and/or his their designee will inform department managers about any early closing times established during the day.

On inclement weather mornings when no cancellation or late openings have been announced, all employees (except those with an approved inclement weather telecommuting agreement) are expected to make a reasonable effort to be at work on time. -Any employee who is unable to get to work is expected to notify their supervisor promptly and will have to utilize their personal leave accruals. -Failure to notify your supervisor will be treated as an unexcused absence. Those employees with an approved inclement weather telecommuting agreement shall be subject to the terms and conditions of that agreement.

In the event of a situation where our offices will be closed because of a power outage, the following steps will be taken:

- Senior Staff will work to contact their teams.
- An email will be sent to all <u>CGBGreen Bank</u> staff and advise them that our offices are closed and inform them of next steps.

# **Community Service Days**

Each employee may take up to one paid workday per year to perform community service. Prior approval by the employee's supervisor is required. The community service must be for 501 c 3 or equivalent non-profit organizations. -The purpose of this policy is to encourage a range of community service activities by CGBGreen Bank employees. This day with pay will not be charged against any leave balance of the employee. -Prior to the date of community service, each employee must provide a written request to their supervisor. –Human Resources will determine whether the proposed service and organization meets the intent of the policy. -A letter from the organization will be required as documentation of participation.

# **SECTION 5 EMPLOYEE BENEFITS**

Employees of <u>CGBGreen Bank</u> are eligible to participate in the medical, dental and retirement benefits offered to employees of the State of Connecticut. In addition, there are certain benefits offered by <u>CGBGreen Bank</u> that are available to our employees. A summary of these benefits follows.

#### Workers' Compensation

All employees are covered under the State of Connecticut Workers' Compensation insurance program. This program covers any injury or illness sustained in the course of employment that requires medical, surgical, or hospital treatment. <u>CGBGreen Bank</u> pays the full premium for this coverage. There is no cost to the employee.

Employees who sustain work-related injuries or illnesses should inform their supervisor immediately. No matter how minor an on-the-job injury may appear, it is important that it be reported immediately. Consistent with applicable state law, failure to report an injury within a reasonable period of time could jeopardize your claim. Supervisors are responsible for calling **MedInsights** at (800) 828-2717 toll-free as quickly as possible, to report any work-related injury sustained by an employee. Supervisors must provide **MedInsights** with the employee's name, home address, home telephone number, description of the injury, and the date and place the injury occurred. Supervisors should also notify Human Resources and the President as quickly as possible of any on the job injury sustained by an employee.

Neither <u>CGBGreen Bank</u> nor the insurance carrier will be liable for the payment of benefits for injuries sustained during an employee's voluntary participation in any recreational, social, or athletic activity sponsored by <u>CGBGreen Bank</u> after normal working hours.

# **Medical Insurance**

Employees become eligible for coverage in a comprehensive health insurance program on the first day of the first full month of employment. Enrollment is limited to the date of hire or open enrollment periods (normally the month of May) as outlined by the employer. The details of the plan options and their coverage will be explained by Human Resources and are listed in the explanatory booklets provided by the insurer. A portion of the cost of the medical insurance for dependents must be covered by employee contributions.

# **Dental Insurance**

Employees become eligible for coverage in a dental insurance program on the first day of the first full month of employment. The details of this insurance coverage will be explained by Human Resources and are listed in the explanatory booklet provided by the insurer.

# **Deferred Compensation**

The Deferred Compensation Plan, created in accordance with Section 457 of the Internal Revenue Code, allows you to defer money earned during your peak earning years and receive its value later when you may be in a lower tax bracket. Amounts you elect to defer are before tax dollars and any interest earned or any gains on these dollars are allowed to accumulate without federal income tax obligations until you receive your money.

Participation in the Plan is voluntary. It is your decision, which should be made after considering all options, as well as your plans for the future. A Deferred Compensation Plan is not intended for savings and investments of a short-term nature since monies deferred are generally not available until you separate from State service. For more information regarding deferred compensation, contact Human Resources.

# **Retirement Plan**

Employees of <u>CGBGreen Bank</u> are provided retirement benefits under the State of Connecticut Retirement Plan (SERS). The benefits provided by the plan are described in the Summary Plan Description given to all eligible employees.

#### **Dependent Care Assistance Program**

CGBGreen Bank employees are eligible to participate in the State of Connecticut Dependent Care Assistance Program (DCAP). With DCAP you have the opportunity to deposit a portion of your pay into a Dependent Care Spending Account. These dollars are deducted on a pre-tax basis and are used to reimburse you for eligible dependent care expenses. These "pre-tax" dollars are exempt from federal and state income taxes.

When you contribute pre-tax dollars to a reimbursement account, you lower your taxable income; therefore, you pay fewer taxes and increase your spendable income. To receive more information, contact Human Resources.

# Life Insurance

Upon employment, CGBGreen Bank provides life insurance coverage at no cost to the employees that work at least 30 hours per week. In the event of an employee's death, life insurance benefits are payable to the person they have he/she has named as beneficiary. Other benefits such as dismemberment, loss of sight, continuation of insurance are explained in the group certificate. All eligible employees will receive a certificate showing the face value of the policy upon receipt of the application by the insurance company. The amount of coverage is equal to two times the employee's annual salary up to a maximum of \$150,000 worth of coverage.

# **Group Life Insurance**

Upon date of hire, employees can elect to participate in group life insurance offered by the State of Connecticut. Employees become eligible for coverage under the State of Connecticut group life insurance plan after six months of employment. The details of this coverage will be explained by Human Resources and are listed in the plan booklet provided by the insurer. The cost of this option is fully borne by the employee.

# **Supplemental Group Life Insurance**

The State of Connecticut also offers supplemental group life insurance to employees whose gross annual income is at least \$45,000. New employees are eligible for this insurance after six months of employment. This benefit is available for present employees to be initiated or increased during open enrollment, which is usually in May. The cost of this option is fully borne by the employee.

# **Other Insurance**

There are several options for insurance available to our employees through the State of Connecticut. Human Resources will provide updates on these options periodically. Please contact Human Resources for further information.

# **Disability Insurance**

CGBGreen Bank provides short-term and long-term disability insurance coverage for all full-time employees. Disability coverage for new employees will commence on the first day of the second full month of employment. Please refer to your certificate booklet for full details, limitations, and provisions of the plan.

# **Connecticut Higher Education Trust Program**

CGBGreen Bank employees are eligible to participate in the State of Connecticut's Higher Education Trust Program, Connecticut's 529 College Savings Program (CHET). With CHET, you have the opportunity to deposit a portion of your pay into a higher education savings account. These dollars are deducted on a pre-tax basis and are "pre-tax" dollars are exempt from federal and state income taxes. To receive more information, contact Human Resources.

# **Employee Assistance Program**

The Employee Assistance Program offers assistance to employees having problems of a personal nature that may affect job performance. Services are also available for family members. Some examples of such problems would be drug or alcohol abuse, marital or family difficulties, or other situations that might have an adverse effect on an employee's emotional health. Participation in the program is confidential and free. It will generally include private consultation with a trained counselor who will advise the employee on what services are appropriate to their need. The counselor will normally refer the employee to qualified providers of treatment or counseling and advise the employee on what services are or are not covered by their health insurance. Any employee needing assistance should contact UCONN EAP at 860-679-2877 or toll-free (in CT) 800-852-4392. The UCONN EAP website is <a href="https://hr.uconn.edu/employee-assistance-program/">https://hr.uconn.edu/employee-assistance-program/</a>

Participation in the EAP program does not excuse employees from complying with normal agency policies or from meeting normal job requirements during or after receiving EAP assistance. Nor will participation in the EAP prevent CGBGreen Bank from taking disciplinary action against any employee for performance problems that occur before or after the employee's seeking assistance through the EAP.

The EAP program is there for you and is totally confidential and voluntary.

#### **Credit Union**

CGBGreen Bank employees may participate in the Connecticut State Employee's Credit Union. Payroll deductions may be arranged. For more information, <u>visit</u> <u>https://www.csecreditunion.com/.</u>telephone CSE Credit Union, Inc., 84 Wadsworth Street, Hartford, CT\_06106, (860) 522-5388 (Savings) or (860) 522-7147 (Loans).

An employee can open an account by completing an application card and a payroll deduction authorization form, which are available in Human Resources.- A check or money order made payable to the Connecticut State Employee's Credit Union must accompany the application and the normal processing time is four (4) weeks.

A change in deduction form may be obtained from Human Resources for employees wishing to stop their deductions. This form must be submitted to CSECU, Inc. The change will take approximately four (4) weeks to become effective.

#### **Other Payroll Deductions**

Payroll deductions may be made for U.S. Savings Bonds and the Connecticut State Employees Campaign for charitable giving. Automobile insurance and homeowner's insurance can also be arranged through payroll deduction utilizing a program established by the State of Connecticut. For more information, contact Human Resources.

# **Direct Deposit**

Direct deposit of paychecks to the banking institution of your choice is available.- Forms are available from Human Resources.- Upon termination of employment, a final paycheck will be issued and not deposited directly.

# **Benefits Continuation (Cobra)**

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under CGBGreen Bank's health plan when a "qualifying event" would normally result in the loss of eligibility. Some common qualifying events are resignation, termination of employment, or death of an employee; a reduction in an employee's hours or a leave of absence; an employee's divorce or legal separation, and a dependent child no longer meeting eligibility requirements. Under COBRA, the employee beneficiary pays the full cost of coverage at CGBGreen Bank group rates plus an administrative fee. CGBGreen Bank will provide each employee with a written notice describing rights granted under COBRA when the employee becomes eligible for coverage under the health insurance plan.

# **Educational Assistance**

Any employee who has satisfactorily completed six months of service (and receives a rating of "meets expectations" or higher as a result of their six month review) and is either continuing <u>his/hertheir</u> education in a job related area, in an area that will assist the employee in upward mobility or promotional opportunities; or is making principal and/or interest payments on qualifying debt incurred in the pursuit of such an educational opportunity shall be eligible to receive educational assistance as follows:

- <u>Tuition assistance</u>: for credit courses at accredited institutions of higher education, fulltime employees will be reimbursed 100% of the cost of tuition and laboratory fees up to a maximum of \$400 per credit taken for undergraduate courses and \$750 per credit for graduate courses. There will be a maximum dollar limit of \$10,000 for tuition assistance per employee per calendar year.
- <u>Student loan reimbursement</u>: Employees may also be reimbursed for their payment of their student debt as defined by the Internal Revenue Service in chapter 11 of Pub. 970. Employees will be reimbursed for actual payments of principal and interest on these loans up to \$5,250 per calendar year, through December 31, 2025.
- Employees may apply for both types of assistance in the same calendar year. The maximum aggregate dollar limit of tuition assistance and student loan reimbursement per employee per calendar year is \$10,000.

Part-time employees who work at least 20 hours per week will be eligible for both forms of educational assistance on a pro-rated basis based on their work schedule. The employee must maintain an overall rating of "meets expectations" during the annual review process to continue to be eligible for either type of assistance under this program.

Requests for tuition and student loan assistance must be submitted via the Educational Assistance form on SharePoint and will be reviewed and approved by the employee's department head and the President <u>and CEO</u> and/or <u>his-their</u> designee based on individual merits. For tuition assistance, management will consider the relevance of the program to the employee's current position, job responsibilities and promotional path prior to approval of the tuition assistance request. In addition, the employee must maintain a grade point average (GPA) of C for undergraduate courses and B for graduate courses to continue receiving tuition

assistance under this program. If an employee's GPA falls below these minimums, further eligibility for tuition assistance will be suspended until the required GPA is achieved.

Employees are financially responsible to reimburse <u>CGBGreen Bank</u> for payments made on their behalf under this program if they resign from their employment with <u>CGBGreen Bank</u> within (6) months of the signed date on the most recent consent authorization section of the Educational Assistance Form.

Employee Tax Liability: <u>CGBGreen Bank</u> follows the current IRS guidelines pertaining to annual reporting of employee educational benefits. Employees should consult with their tax advisor regarding this matter.

Employees interested in applying for tuition assistance under this program should follow the steps below to assure prompt reimbursement.

- 1. Complete the Tuition Assistance section of the Educational Assistance Form on SharePoint and submit it.
- 2. The request will be reviewed and if appropriate, approved by your department head and the President/Designee.
- 3. Once approved, you are enrolled in the program. Submit a copy of course registrations, invoices, and any other related documents to the Managing Director of Operations for review and payment approval through a payment request on SharePoint. Tuition reimbursements will only be made to the extent the employee submits evidence of tuition payments at least in the amount requested (not to exceed statutory maximums and overall program limits).
- 4. Upon completion of the semester, submit a copy of your grades and current GPA to the Managing Director of Operations. Failure to do so may render you ineligible for tuition assistance for future course.

Employees interested in applying for student loan assistance under this program follow the steps below to assure prompt reimbursement.

- 1. At any point during the calendar year, complete the Student Loan Reimbursement section of the Educational Assistance Form and submit it. You will be asked to submit documentation showing an active student loan account where payments are being made regularly.
- 2. The request will be reviewed and if appropriate, approved by your department head and the President/Designee.
- 3. Once approved, submit a copy of proof of loan payments and any other related documents to the Managing Director of Operations for review and payment approval through a payment request on SharePoint. Student loan reimbursements will only be made to the extent the employee submits evidence of loan payments of at least in the amount requested and not more than \$5,250 per calendar year.
- 4. If you submit requests in subsequent calendar years (program extends through the end of 2025), you will need to demonstrate payment(s) of the amount that the Green Bank has paid to you over the course of the program.

Employees interested in applying for both forms of assistance under this program should complete and submit an Educational Assistance form for each type of assistance and follow the applicable steps for both parts above.

# Training

All employees of <u>CGBGreen Bank</u> are encouraged to take advantage of any job-related training opportunities that will enhance their job performance. <u>CGBGreen Bank</u> will pay the cost of any training deemed necessary for its employees.

The following is the procedure for signing up for and attending training:

- 1. The supervisor and employee will work together to develop a training plan for the employee based on the requirements of the job and the employees specific training needs.
- 2. The employee initiates a training request form and forwards it to their supervisor for approval.
- 3. The supervisor determines if the training is necessary, job-related, and if there is adequate office coverage for the employee to attend the training.
- 4. The employee attends the training and receives a certificate or attendance confirmation.
- 5. Upon return to the office, the employee forwards a copy of that certificate or attendance confirmation to Human Resources to be added to the personnel file.
- 6. The employee is responsible for sharing information learned at training that might be useful to other staff. The employee is also responsible for utilizing or practicing the subject material (i.e., computer training) and will be held accountable for the training material.

In addition, there are several training programs mandated for our employees by the State of Connecticut – sexual harassment prevention, diversity training, workplace violence prevention training and ethics training. Human Resources will work with employees to ensure they attend these mandatory training sessions.

# **Gym Membership**

The Green Bank will cover the cost of membership to the Capewell Lofts gym for all employees based in the Hartford office. Employees based in the Stamford office can expense monthly membership to the gym co-located in the Canal Street complex up to \$30 per month.

SECTION 6 TRAVEL AND ENTERTAINMENT POLICY

#### **Travel and Entertainment Policy**

This policy provides guidelines and establishes procedures for employees incurring business travel and entertainment expenses on CGBGreen Bank 's behalf.

Our objective is to provide employees with a reasonable level of services and comfort while traveling on CGBGreen Bank business. In order to accomplish this objective all employees must have a clear understanding of the policies and procedures for business travel and entertainment.

#### **Responsibility and Enforcement**

The employee is responsible for complying with the travel and entertainment policy. An expense report form must be completed by the employee within 30 days of incurring the expense to request reimbursement for travel and entertainment expenses.

The employee's supervisor is responsible for reviewing and approving expense reports prior to their submission.

CGBGreen Bank assumes no obligation to reimburse employees for expenses that are not in compliance with this policy or are not submitted within 30 days of incurring the expense.

#### Who to Call About Travel Policy Questions

Any questions, concerns, or suggestions regarding this travel policy should be directed to the Finance Department.

#### **Airline Class of Service**

All air travel must be in Coach class. Employees are expected to use the lowest reasonable airfare available.

#### **Upgrades for Air Travel**

Upgrades at the expense of <u>CGBGreen Bank</u> are **NOT** permitted. Upgrades are allowed at the employee's personal expense.

#### **Unused/Voided Airline Tickets**

Unused airline tickets or flight coupons must never be discarded or destroyed as these documents may have a cash value. To expedite refunds, unused or partially used airline tickets must be returned immediately to the designated department employee. Do not send unused tickets to the airlines or include them with expense reports.

#### Lodging

Employees are entitled to stay in a single room with a private bath. Employees may accept room upgrades to suites or executive floor rooms if the upgrade does not result in additional cost to CGBGreen Bank.

#### **Room Guarantee / Cancellation and Payment Procedures**

It is the responsibility of the employee to cancel the room prior to the deadline if business needs require a change in travel plans (cancellation deadlines are based on the local time of the property). Employees should request and record the cancellation number for potential billing disputes.

# Travel Insurance Coverage

Expenses for additional travel insurance coverage will not be reimbursed.

# **Rental Car**

## Guidelines

Employees may rent a car at their destination when:

- It is less expensive than other transportation modes such as taxis, Uber, Lyft, airport limousines and airport shuttles.
- Entertaining customers.
- Employees may reserve rental cars in advance if that is the most reasonable and costeffective means of transportation.

# Categories

CGB<u>Green Bank</u> reimburses the costs of Compact or Intermediate class rental cars. Employees may book a class of service one-level higher when:

- Entertaining customers.
- The employee can be upgraded at no extra cost to CGBGreen Bank.
- Transporting excess baggage such as booth displays.
- Pre-approved medical reasons preclude the use of smaller cars.

## Insurance

Employees should decline all insurance coverage when renting a car for <u>CGBGreen Bank</u> use as <u>CGBGreen Bank</u> has suitable coverage in our general liability policy to cover these situations.

# **Cancellation Procedures**

Employees are responsible for cancelling rental car reservations. Employees should request and record the cancellation number in case of billing disputes. Employees will be held responsible for unused car rentals that were not properly cancelled.

# Return

Every reasonable effort must be made to return the rental car:

- To the original city unless pre-approved for a one-way rental.
- Undamaged (i.e., no bumps, scratches, or mechanical failures).
- On time, to avoid additional hourly charges.
- With a full tank of gas.

# **Reimbursement for Personal Car Usage**

Employees will be reimbursed for business usage of personal cars on a fixed scale as determined by CGBGreen Bank's mileage allowance. The mileage allowance is updated once a year in January and follows the mileage allowance set by the Internal Revenue Service. When working out of the office or out of town, any commute time clocked which is less than your normal daily commute is not reimbursable. Employees will not be reimbursed for any repairs to their personal car even if these costs result from business travel. To be reimbursed for use of their personal car for business, employees must provide on their expense report:

• Purpose of the trip.

- Date and location.
- Receipts for tolls, parking.

# **Ground Transportation to and from Terminals**

The most economical mode of transportation should be used to and from airports and bus and rail terminals when the employee is not accompanying a customer. The following modes of transportation should be considered:

- Public transportation (buses, subways, taxis, Uber, Lyft).
- Hotel and airport shuttle services.
- Personal car.

# Personal/Vacation Travel

# **Combining Personal with Business Travel**

Personal vacation travel may be combined with business travel provided there is no additional cost to CGBGreen Bank. Corporate credit cards must **NOT** be used to pay for personal/vacation travel.

# **Spouse / Companion Travel**

A spouse or other individual may accompany an employee on a business trip at the employee's expense. CGBGreen Bank will not reimburse travel and entertainment expenses incurred by a spouse or other individual accompanying an employee on business unless:

- There is a bona fide business purpose for taking the spouse or other individual.
- The expense incurred would otherwise be reimbursable; and
- There is prior approval from the President.

# **Telephone Usage**

# **Business Phone Calls**

Employees will be reimbursed for using their personal cell phone or home phone for business phone calls that are reasonable and necessary for conducting business. Expenses must be substantiated with the original telephone bill. The finance department maintains a cell phone reimbursement policy. If you are contemplating using a cell phone for business purposes on a regular basis, contact the finance department to obtain a copy of the policy.

# **Airphone Usage**

Employees will be reimbursed for using an airphone only in an emergency or if critical business issues necessitate its use.

# **Meals and Entertainment**

# Personal Meal Expenses

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

# **Business Meal Expenses**

Business meals are defined as those taken with clients, prospects, or associates during which a specific business discussion takes place. Employees will be reimbursed for business meal expenses according to actual and reasonable cost.

## **Business Meals Taken with Other Employees**

Employees will be reimbursed for business-related meals taken with other employees only in the following circumstances:

- When a client is present.
- When, for confidentiality reasons, business must be conducted off CGBGreen Bank premises.
- When traveling together for business.

Meal costs for social occasions, such as employee birthdays; secretary's day, etc. are not classified as business meals or entertainment expenses.

# **Entertaining Customers**

Entertainment expenses include events that include business discussions, which take place during, immediately before or immediately after the event, are eligible for reimbursement for entertaining customers, with the prior approval from the President.

# Tipping

Tips included on meal receipts will be reimbursed. Any tips considered excessive will not be reimbursed. As a general rule, employees should not tip more than 15% to 20% of the cost of the meal.

Other types of tips for porters, maid service, etc. should be reasonable.

## **Payment for Meals and Entertainment**

When more than one employee is present at a business meal, the most senior level employee should pay and expense the bill.

# **Documentation Requirements**

A receipt must be submitted with the expense report for any individual meal or entertainment expense. If a receipt is lost or destroyed, the President or Vice President Finance and Administration must approve the expense. In addition, for business meals and entertainment expenses, the following documentation is required and must be recorded on the expense report:

- Names of individuals present, their titles, and company name.
- Name and location of where the meal or event took place.
- Exact amount and date of the expense.
- Specific business topic discussed.
- In the case of entertainment events, the specific time the business discussion took place (i.e., before, during or after the event).

# **Corporate Charge Card**

The President <u>and CEO</u> and/or <u>his their</u> designee must approve the issuance of a corporate charge card.

# Personal Use of Corporate Charge Card

Corporate charge cards are intended for business use. Corporate charge cards must **NOT** be used for personal expenses and use of the corporate charge card for personal expenses will result in termination of the card.

## **Reporting Lost / Stolen Charge Cards**

A lost or stolen corporate charge card must be reported to the card issuer and the Managing Director of Operations as soon as the employee discovers it is missing. Statistics on stolen charge cards indicates that unauthorized use of stolen cards is greatest in the first few hours after the theft.

## **Expense Reporting**

An expense report form is required to be completed <u>via SharePoint</u> to request reimbursement for incurred eligible travel and entertainment expenses.

A link to the expense reports folder is located on tThe expense report form is located in SharePoint Forms. The form will automatically calculate mileage reimbursements, total expenses by day and by type and calculate the net amount due the employee. Please be sure to select the current year's form.

The expense report is to be completed and submitted for reimbursement in a timely manner. Expense reports should be submitted within one week of incurring the expense. <u>CGBGreen</u> <u>Bank</u> will assume no obligation to reimburse employees for expenses that are not submitted within 30 days of incurring the expense.

The type of expense and dollar amount must be separated on a **daily basis**. -For example: a hotel bill may include meals, lodging and telephone expenses.- Each category must be split and entered in the appropriate space on the expense report form with expenses allocated for each travel day.

## **Approval / Authorization Process**

All expense reports must be approved by the employee's immediate supervisor and then forwarded to the Finance Department. The President and CEO's expense report will be approved by the Executive Vice President Finance and Administration. Individuals approving expense reports are responsible for ensuring:

- The correctness, reasonableness, and legibility of entries.
- Applicable receipts are attached.
- Charges are consistent with policy and were incurred for business purposes.
- Expenses are adequately explained.
- The expense report is signed by the employee.

In accordance with present rules and guidelines, charges that are questionable should be discussed with the employee and resolved **before** the expense report is approved.

## **Expense Report Review**

The Finance Department will review each employee expense report for:

- Approval signatures.
- Business purpose.
- Correct totals.
- Supporting documentation and receipts.

• Policy compliance.

The Finance Department will not reimburse any expense that is not in compliance with CGBGreen Bank's travel and entertainment policy.

# Examples of Acceptable Documentation:

- Air/Rail original passenger coupon.
- Hotel hotel folio plus charge card receipt or other proof of payment.
- Car Rental rental car agreement plus charge card receipt or other proof of payment.
- Meals/Entertainment charge card receipt or cash register receipt.
- Receipts for all miscellaneous expenses over \$10.00.

Receipts must include the name of the vendor, location, date, and dollar amount of the expense. When a receipt is not available, a full explanation of the expense and the reason for the missing receipt is required.

# **Incorrect or Incomplete Expense Reports**

Expense reports that are incorrect or incomplete will be returned to the employee for corrective action and may result in delay or non-reimbursement of specific items. Violating CGBGreen Bank policy or altering of receipts can result in disciplinary action up to and including termination.

# Employees Will Not Be Reimbursed for the Following Items:

- Airline club membership dues.
- Airline headsets.
- Airline drinks.
- Airline or personal insurance.
- Annual fees for personal credit card.
- Barbers and hairdressers.
- Birthday lunches.
- Car washes.
- Cellular phone repairs. (note that employees will be reimbursed for business use on their cellular phones pursuant to the CGBGreen Bank Mobile Communications Policy.
- Childcare.
- Clothing (i.e., socks, pantyhose, etc.).
- Expenses for travel companions/family members.
- Expenses related to vacation or personal days while on a business trip.
- Flowers or gifts for employees or customers (unless approved by the President or a Vice President).
- Gum, candy, or cigarettes.
- Health club facilities, saunas, massages.
- Hotel movies.
- Hotel room refrigerator items.
- Hotel laundry and valet services unless the trip exceeds five consecutive days.
- Interest or late fees incurred on a personal credit card.
- Loss/theft of cash advance money or Company-paid airline tickets.
- Loss/theft of personal funds or property.
- Magazines, books, newspapers, subscriptions.
- Mileage for travel between home and office/work site.

- "No show" charges for hotel or car service.
- Optional travel or baggage insurance.
- Parking or traffic tickets.
- Personal accident insurance.
- Personal entertainment, including sports events.
- Personal toiletries.
- Pet care.
- Postage costs, postcards (sent to fellow employees).
- Shoeshine.
- Short term airport parking (except for 1-day trips only
- Unexplained or excessive expenses which are not within the intent of CGBGreen Bank policy will not be reimbursed.

All employees must review this policy and sign the acknowledgement form found in the Appendix and return it to Human Resources.

SECTION 7 GENERAL RULES OF CONDUCT

Ethical conduct is a core value of the Connecticut Green Bank and all board members and employees of CGBGreen Bank are expected to maintain the highest professional standards in the conduct of their duties. In particular, CGBGreen Bank employees are considered to be "state employees" and members of CGBGreen Bank's Board of Directors are considered to be "public officials". A copy of the Public Officials and State Employees Guide to the Code of Ethics (the "Guide") is included at end of handbook for reference. You may also access both the Code of Ethics and the Guide on the Office of State Ethics website at <u>www.ct.gove/ethics</u> by clicking on "Statutes and Regulations" and "Public Official and State Employee Information", respectively.

## **General Rules of Conduct**

To ensure orderly operations and provide the best possible work environment, CGBGreen Bank expects employees to follow rules of conduct that will protect the interests and safety of all employees and the organization. Although it is not possible to list all the forms of behavior that are unacceptable, the following are examples of infractions that may result in disciplinary action, up to and including termination of employment:

- Theft or inappropriate removal or possession of property of CGBGreen Bank, clients or other employees.
- Dishonesty or misrepresenting, falsifying, or providing misleading records including, but not limited to, employment applications or resumes, time keeping records, client records, expense requests, etc.
- Working under the influence of alcohol or illegal drugs.
- Possession, distribution, manufacturing, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty.
- Fighting, wrestling, horseplay, or threatening violence in the workplace.
- Use of obscene or vulgar language, insubordination or other disrespectful conduct including, but not limited to, refusal to perform assigned work.
- Taking any action detrimental to CGBGreen Bank, fellow employees, clients, or visitors.
- Unsafe behavior and/or violation of safety or health rules.
- Sexual or other unlawful or unwelcome discrimination or harassment.
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace.
- Excessive absenteeism, tardiness, or any absence without notices.
- Unauthorized use of telephones, mail system, or other employer-owned equipment for personal use or other unauthorized operation.
- Sleeping, loafing, failure to demonstrate a professional behavior in carrying out assigned tasks.
- Soliciting, gambling, taking orders, selling tickets, collecting, or contributing money for any unauthorized cause.
- Engaging in outside business activities that conflict with CGBGreen Bank's interests or interfere with proper performance of job duties.
- Failure to report a work-related injury immediately.
- Unauthorized use or the willful damage, abuse, or destruction of CGBGreen Bank property or the property of others.
- Violation of CGBGreen Bank's personnel policies and/or rules.
- Unsatisfactory work performance.

The examples listed above are not intended to cover all situations that may result in disciplinary action but are only intended to be guidelines as to what are considered improper standards of

work conduct. Also, this policy does not alter the at-will nature of an employee's employment with CGBGreen Bank.

If any employee's behavior or interactions jeopardize positive working relationships with clients and render the employee unable to fulfill the responsibilities of <u>his/hertheir</u> position, or place <u>CGBGreen Bank</u> at risk of liability, the employee will be subject to review and possible disciplinary actions.

It is important for all employees to conduct themselves in a way that is fair to each other and to our common objective of delivering quality services.

# **Personal Appearance**

The nature of our business at CGBGreen Bank puts us in frequent contact with clients and the public. We enjoy an excellent reputation among the energy community in Connecticut. While there are many reasons for this reputation, one of the ways to help maintain it is for all staff to present a professional image to the community. It is important that they have confidence in the staff, and the staff members have confidence/pride in themselves when doing business. To help present this image and foster public confidence, staff members must dress appropriately for their work assignments and use common sense and good judgment in their appearance. Employees with questions regarding what is deemed appropriate dress for his/hertheir work assignments should discuss this with his/hertheir supervisor. CGBGreen Bank reserves the right to determine individual compliance with the policy in all questionable cases.

## **Personal Appearance Guidelines**

Staff will wear clean and well-maintained attire appropriate to the type of work they do. Shoes are required and must also be well-maintained. Good grooming is required. Formal business attire may be expected for internal and external events such as board meetings, hearings, presentations, and meetings.

Business casual attire and jeans is acceptable for being in the office and other occasions where clients are not present.

In compliance with this policy, the following are examples of unacceptable attire:

- torn, patched/faded clothing
- athletic wear, e.g., shorts, T-shirts, skorts, etc.
- halter tops
- tube tops
- rubber soled flip flops, shorts (any pants or slacks that ends above the knee)
- shirts with slogans or large letter advertising

## **Freedom from Harassment**

CGBGreen Bank is committed to treating its employees with dignity and respect. All employees have a right to be free from racial or ethnic slurs, unwelcome sexual advances, or any other verbal or physical conduct that constitutes harassment. CGBGreen Bank is committed to providing a work environment that is free of discrimination and unlawful harassment.

Sexual harassment is unlawful under federal and state law. The <u>CGBGreen Bank</u> statement on Sexual Harassment and the Equal Employment Opportunity Commission "Guidelines on Discrimination Because of Sex" provides that unwelcomed sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting that person.
- 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.

Actions, words, jokes, or comments based on an individual's sex, race, ethnicity, age, religion, or any other legally protected characteristics will not be tolerated. As an example, sexual harassment (both overt and subtle) is a form of employee misconduct that is demeaning to

another person, undermines the integrity of the employment relationship, and is strictly prohibited.

Sexual, racial, ethnic, or other unlawful harassment of employees by supervisory or nonsupervisory employees of CGBthe Green Bank, or by non-employees (including clients) will not be tolerated. All members of CGBthe Green Bank management and supervision have the explicit responsibility to take immediate corrective action to prevent any sexual, racial, ethnic, or other harassment.

Any employee who wishes to report an incident of unlawful harassment should promptly report the matter to <u>theirhis or her</u> supervisor. If the supervisor is unavailable or the employee prefers to report the incident to someone other than the supervisor, <u>he or she they</u> should immediately contact the Human Resources designee or any other available manager.

Anyone engaging in unlawful harassment will be subject to disciplinary action, up to and including termination of employment.

## **Sexual Harassment**

Title VII of the Civil Rights Act of 1964, which is a federal law and Connecticut law, prohibit sexual harassment. <u>CGBGreen Bank</u> will not tolerate sexual harassment in the workplace. No employee-either male or female-should be subject to unwelcome verbal or physical conduct that is sexual in nature or shows hostility to the employee because of the employee's gender. Sexual harassment does not refer to occasional compliments of a socially acceptable nature. It refers to behavior that is not welcome, that is personally offensive, that debilitates morale, and that, therefore, interferes with work effectiveness.

# **Management Responsibility**

Management at all levels of <u>CGBthe Green Bank</u> is responsible for preventing sexual harassment in the workplace. This responsibility includes immediately reporting conduct by anyone, whether a coworker, supervisor, or non-employee, that may constitute sexual harassment, even if the conduct was sanctioned and regardless of how awareness of conduct was gained.

# **Prohibition Against Sexual Harassment**

CGBGreen Bank strictly enforces a prohibition against sexual harassment of any of its employees. Sexual harassment prohibited by state and federal law and by this policy includes the following conduct:

- Unwelcome verbal or physical conduct of a sexual nature when submission to such conduct is made either an explicit or implicit term or condition of any individual's employment (such as promotion, training, timekeeping, overtime assignments, leaves of absence); or
- Unwelcome verbal or physical conduct of a sexual nature when submission to or rejection of such conduct by an individual is used as the basis for employment decisions; or
- Unwelcome verbal or physical conduct of a sexual nature when the conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment; or
- Unwelcome verbal or physical non-sexual conduct that denigrates or shows hostility toward a person because of <u>theirhis or her</u> gender when the conduct has the purpose or

effect of substantially interfering with an individual's work performance, or creating an intimidating, hostile, or offensive work environment.

• Sexual harassment is a form of sexual discrimination, and neither sexual harassment nor discrimination will be tolerated.

# Examples of Conduct Prohibited by This Policy Include:

- Offering or implying an employment-related reward (such as a promotion or raise) in exchange for sexual favors or submission to sexual conduct.
- Threatening or taking a negative employment action (such as termination, demotion, denial of a leave of absence) if sexual conduct is rejected.
- Unwelcome sexual advances or repeated flirtations.
- Graphic verbal commentary about an individual's body, sexual prowess, or sexual deficiencies.
- Sexually degrading or vulgar words to describe an individual.
- Leering, whistling, touching, pinching, brushing the body, assault, coerced sexual acts, or suggestive, insulting, or obscene comments or gestures.
- Asking unwelcome questions or making unwelcome comments about another person's sexual activities, dating, personal or intimate relationships, or appearance.
- Conduct or remarks that are sexually suggestive or that demean or show hostility to a person because of that person's gender (including jokes, pranks, teasing, obscenities, obscene or rude gestures or noises, slurs, epithets, taunts, negative stereotyping, threats, blocking of physical movement).
- Displaying or circulating pictures, objects, or written materials (including graffiti, cartoons, photographs, pinups, calendars, magazines, figurines, novelty items) that are sexually suggestive or that demean or show hostility to a person because of that person's gender.
- Retaliation against employees complaining about such behaviors.
- Harassment consistently targeted at only one sex, even if the content of the verbal abuse is not sexual.
- Sexually suggestive or flirtatious letters, notes, e-mail, or voice mail

This policy covers all employees. <u>CGBGreen Bank</u> will not tolerate, condone, or allow sexual harassment whether engaged in by fellow employees, supervisors, and associates or by outside clients, opposing counsel, personnel or other non-employees who conduct business with this agency.

## **General Harassment**

Actions, words, jokes or comments based on an individual's sex, race, ethnicity, age, religion, or any other legally protected characteristic will not be tolerated. Such conduct can unreasonably interfere with work performance and create an intimidating, hostile and offensive work environment.

We expect all employees to consider at all times the effect your words and actions may have on those with whom you work. While you may feel that your behavior is harmless, it is the way your words and actions are perceived by others that counts.

Please do not assume that the agency is aware of a harassment situation. It is in your best interest and your responsibility to bring your complaints and concerns to management's attention so that the issue may be resolved.

# **Complaint Process**

Should you ever experience any job harassment problem, please exercise the steps in our agency Grievance Procedure (outlined in Section 7 of this handbook), or at your option, you may directly contact Human Resources. You may expect prompt and concerned reaction to your problem. Any employee engaging in unlawful harassment will be subject to disciplinary action, up to and including termination.

# Sanctions

Any employee found to have engaged in sexual harassment or sexual discrimination will be subject to appropriate discipline, up to and including discharge.

## **No Retaliation**

This policy also prohibits retaliation against employees who bring sexual harassment charges or assist in investigating charges. Retaliation in violation of this policy may result in discipline up to and including termination. Any employee bringing a sexual harassment complaint or assisting in the investigation of such a complaint will not be adversely affected in terms and conditions of employment, nor discriminated against or discharged because of the complaint.

All employees must review this policy and sign the acknowledgement form found in the Appendix and return it to Human Resources.

# **Confidential Disclosure Policy**

# Instructions: Please read this Confidential Disclosure Policy form carefully, then sign and return this form to Human Resources.

I understand that in connection with my work for CGBGreen Bank, I may be exposed to or given confidential or proprietary information belonging to CGBGreen Bank and others, including, but not limited to, information concerning trade secrets, business, products, finances, personnel information, and plans of CGBGreen Bank or CGBGreen Bank's clients, portfolio companies and applicants, (the Confidential Information). Without limitation, examples of Confidential Information are drawings, manuals, notebooks, reports, models, inventions, formulas, processes, machines, compositions, computer programs, accounting methods, financial information, business and marketing plans and information systems.

Some of the Confidential Information may belong to or relate to "publicly held" companies and may include "inside information" which is not available to the public. My employment by <u>CGBGreen Bank</u> creates a relationship of special confidence and trust between me and <u>CGBGreen Bank</u> with respect to the Confidential Information.

I agree as follows:

- I will not, either during or subsequent to my employment by CGBGreen Bank, (1) publish or otherwise disclose Confidential Information except to persons who may from time to time be designated by CGBGreen Bank as proper recipients of such Confidential Information or (2) use the Confidential Information (including any inside information) either for the benefit of myself or for the benefit of anyone other than CGBGreen Bank. If I have any questions regarding whether any information is Confidential, I will ask my supervisor for instructions and will not disclose such information unless otherwise instructed by my supervisor.
- 2. The Confidential Information will remain at all times the property of CGBGreen Bank or the rightful owners thereof notwithstanding its disclosure to me.
- 3. I will promptly disclose to CGBGreen Bank all materials, innovations, studies, writings, or other works created or developed by me as a result of tasks assigned to me by CGBGreen Bank or exposure to the Confidential Information ("Work Product"). I agree that all ("Work Product") shall be the sole property of CGBGreen Bank and that CGBGreen Bank shall be the sole owner of all copyrights and other intellectual property rights related thereto. I hereby assign to CGBGreen Bank any and all rights which I may have or acquire in any Work Product and agree to assist CGBGreen Bank in every way (but at CGBGreen Bank's expense) to obtain or enforce copyrights and other interests in the Work Products as CGBGreen Bank may desire.
- Upon termination of my employment with <u>CGBGreen Bank</u> or whenever requested by <u>CGBGreen Bank</u>, I will promptly deliver to <u>CGBGreen Bank</u> all Work Product and all documents and other tangible embodiments of the Confidential Information and any copies thereof.

## **Confidential Disclosure Policy**

This agreement supersedes and replaces any existing agreement between CGBGreen Bank and me relating generally to the same subject matter. It may not be modified or terminated, in whole or in part, except in writing signed by an authorized representative of CGBGreen Bank. Discharge of my undertakings in this agreement shall be an obligation of my executors, administrators, or other legal representatives or assigns. All employees must review this policy and sign the acknowledgement form found in the Appendix and return it to Human Resources.

# **Computer Use Policy**

## Purpose

Your CGBGreen Bank assigned computer is a resource and is subject to the same rules as other CGBGreen Bank resources. The purpose of this policy is to ensure that employees understand the guidelines governing computer and other electronic communications (including tablet computers and mobile phones) use with regard to Internet access, email, other electronic communications, software licensing, security, and personal use, in particular.

This policy cannot provide rules and guidance to cover every possible situation. Instead, it is designed to express CGBthe Green Bank's philosophy and set out the general principles that employees should apply when using company computers and technology. These policies apply to all CGBGreen Bank employees and staff (consultants, third-party contractors, and administrators).

This policy does not cover health and safety issues.

Issues not directly addressed in this policy or in some other written form are to be decided by HR and/or CGBGreen Bank management should the need(s) and situation(s) arise. Further policy documents are forthcoming to cover specific areas of acceptable use as technology is deployed.

Unless otherwise stated, violation of these policies may result in disciplinary action, up to and including termination and/or legal action.

## General

CGB<u>Green Bank</u> provides employees and staff with personal computers (PCs), printers and other computer equipment as necessary to perform their job. Employees should not expect the latest hardware or software releases to be provided unless there is a business reason to do so.

CGBGreen Bank encourages the use of email, voicemail, online services, the Internet, and Intranet as they can make communication more efficient and effective. In addition, they can provide valuable sources of information about vendors, customers, competitors, technology and new products and services. Pursuant to the Freedom of Information Act (FOIA), no employee shall have any expectation of privacy in any CGBGreen Bank work product.

Everyone connected with the organization should remember that electronic media and services provided by the company are company property and their purpose is to facilitate and support company business. Data stored and/or accessed on company equipment, regardless of origin, purpose, or design should also be considered to be within, at least, company purview, oversight, and audit rights. The company reserves the right to access data of any sort, stored or located on company provided equipment.

The following are examples of **<u>non-business</u>**-related activities that are prohibited:

- Streaming music or video.
- Shopping.
- Booking a vacation.
- Using instant messaging.
- Viewing personal pictures over the web.
- Downloading unauthorized computer software or pornographic materials.

# E-Mail

All employees and staff are supplied with a company email address and the means by which to access their account. These details are provided by <u>CGBthe Green Bank</u> as part of our IT orientation process. -E-mail messages are considered public records and are subject to the Freedom of Information Act. -Furthermore, e-mail, both incoming and outgoing, is not confidential and is monitored by the Information Technology Department. -All e-mail correspondence is saved on the network backup solution and is easily retrievable. You should take great care to scrutinize what you include in an e-mail message. E-mail messages may exist on the system indefinitely and may be recoverable even after you have deleted the message.

All employees must create and use a business email signature, based on the approved template that is generated by the Marketing department.

All non-company email services, such as Gmail, Hotmail, Yahoo, etc. are never to be used for company purposes. If third-party email services must be used, it will be provisionally and under direct supervision of the Operations Department. Never is an employee or staff member to use a personal email account to correspond with clients.

Electronic media (email, web browsers, etc.) must not be used for knowingly transmitting, retrieving or storage of any communication that:

- Is discriminatory
- Is harassing or threatening
- Is derogatory to any individual or group
- Is obscene or pornographic
- Is defamatory
- Is engaged in any purpose that is illegal or contrary to CGBGreen Bank's policy or business interests
- Contains unencrypted personal information
- Contains unencrypted intellectual property

Further, all forms of mass email (including 'virus warnings', 'good luck' and similar messages) are unacceptable unless for an approved business purpose.

The transmission of usernames, passwords, or other information related to the security of CGBGreen Bank's computers is prohibited. If a password protected file absolutely must be emailed, the password should be sent in a separate email from the document or communicated in another manner.

Employees should avoid sending unnecessary informational emails to large parts or all of the organization. However, we recognize the business need for companywide emails, but there will be a strictly monitored and governed use of such behavior and practice. Failure to comply with these guidelines could result in disciplinary action.

#### **Email Disclaimer**

An email disclaimer is automatically added through our exchange server to the end of all e-mail being sent outside the office. Do not add your own disclaimer to messages. The company disclaimer is as follows:

NOTICE TO RECIPIENT: This e-mail is (1) subject to the Connecticut Freedom of Information Act and (2) may be confidential and is for use only by the individual or entity to whom it is addressed. Any disclosure, copying or distribution of this e-mail or the taking of any action

based on its contents, other than for its intended purpose, is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately and delete it from your system.

## External email and participation in online forums

Employees should be aware that any messages or information sent using the company systems are statements identifiable and attributable to the company. Thus, an email carries the same weight in law as a letter written on company stationery.

Employees should note that even with a disclaimer, as described above, a connection with the company still exists and a statement could be imputed legally to CGBGreen Bank. Therefore, no one should rely on disclaimers as a way of insulating CGBGreen Bank from the comments and opinions that are contributed to forums or communicated in emails. Instead, discussions must be limited to matters of fact and expressions of opinion should be avoided while using company systems or a company-provided account. Communications must not reveal information about company processes, techniques, trade secrets, or confidential information and must not otherwise violate this or other company policies.

Employees should not send file attachments by email in situations where there is any potential for the compromise of company secrets or in relation to litigation. Be aware, files from many word processing packages, including Microsoft Word, retain information related to previous versions of the document that can later be retrieved.

## **Electronic calendars and voicemail**

It is <u>CGBGreen Bank</u> policy that all employees keep their electronic calendars up to date (using Microsoft Outlook) and that calendars can be read by supervisors. When a meeting or event needs to be kept confidential, it should be marked as 'private' with the appropriate program functionality.

It is <u>CGBGreen Bank</u> policy that all employees with email and/or voicemail keep their "out of office assistant" or pre-recorded greetings up to date. In particular, during periods of absence from the office, these greetings should provide the individual with information indicating when the employee will receive a message or information about an alternative contact.

## **Illegal & Prohibited Activities**

Use of your computer for an illegal purpose is prohibited. Illegal activities include violations of local, state and/or federal laws and regulations. Connecticut General Statutes, section 53a-251 establishes the crime of "Computer Crime." A person can be charged with a computer crime for such things as:

- Unauthorized access to a computer system.
- Theft of computer services.
- Interruption of computer services.
- Misuse of computer services.
- Destruction of computer equipment.

A computer crime violation can range from a Class B Felony (1 to 20 years in prison and up to \$20,000 fine) to a Class B Misdemeanor (up to 6 months in prison and up to \$1,000 fine) depending on the amount of money or damage involved.

CGBGreen Bank strives to maintain a workplace free of harassment and sensitive to the diversity of its employees. Therefore, CGBGreen Bank prohibits the use of any of its systems, including the computers and the e-mail system in ways that are disruptive, offensive to others, or harmful to morale. For example, the display or transmission of sexually explicit images, messages, and cartoons is not allowed. Other such misuse includes, but is not limited to, ethnic slurs, racial comments, off-color jokes, or anything that may be construed as harassment or showing disrespect for others.

It is recognized that employees do not have complete control over all incoming e-mail that is sent to CGBGreen Bank. However, it is the responsibility of every employee to monitor incoming e-mail and request cessation of inappropriate, voluminous, unprofessional, or disruptive e-mail.

## Software

It is CGBGreen Bank policy that only licensed software that is legally owned by the company may be used. All use of unlicensed software is expressly forbidden, unless written pre-approval by IT and management. However, you are not allowed to install any software on any company hardware. All software must be approved and installed in coordination with the Managing Director of Operations. As always, proper documentation of licensing is required.

In order to implement this policy, CGBGreen Bank maintains a central register containing physical licenses for the software install on its computers. Where no physical manifestation of a license exists, a written record of the license purchase is kept with a reference to the relevant invoice. It is the responsibility of the IT vendor and Operations team to maintain this license repository.

Free or shareware programs should not be installed on company computers due to the risk of virus infection and other side effects without approval from IT. Where installed, they are only exempt from the central license recording provided the software clearly identifies itself as free.

# **CGB**<u>Green Bank</u> Computer Software Overview—Microsoft 365

The Connecticut Green Bank uses Microsoft 365, a cloud-based subscription service that includes various office applications, cloud storage, and security systems, all designed to work together to facilitate productivity, collaboration, and communication in a business environment.

The standard applications that Green Bank staff uses for basic office tasks are all from the Microsoft 365 suite of services: Outlook (email), Word (word processing), Excel (spreadsheets), and PowerPoint (presentations).

In addition, we have also implemented Teams and OneDrive, and will soon be rolling SharePoint out to the organization as a replacement for the P Drive. Since these applications may be less familiar to staff, below is on overview of what each application does and when and how it should be used.

## <u>Teams</u>

An application that allows internal and external users to collaborate on projects using documents, calendars, chat, and other features. Teams also functions as our phone system and internal chat application.

#### Benefits of using Teams:

• Better security and compliance than our previous document-sharing software

- Accessibility (access information across approved devices without the need of a VPN) and availability (anytime, anywhere access to information)
- Version control and ease of connection with other Office 365 applications

#### What is the function of Teams within our working environment?

Create a Team when you want to connect internal and/or external individuals around a specific project. The Teams application functions as our phone system and our internal chat service.

## **OneDrive**

An application that allows users to store and backup their personal business files, available on the web and via a desktop app. OneDrive Includes cloud storage that you can get to from anywhere to help you stay organized and access your important documents easily.

#### Benefits of using OneDrive:

- Better security and compliance
- Accessibility (access information across approved devices without the need of a VPN) and availability (anytime, anywhere access to information)
- Helpful features, such as version control and ease of connection with other Office 365 applications

OneDrive is a place to store your personal business documents (paystubs, expense reports, reviews, etc.) since no one can access any documents there unless you give them permission.

OneDrive should also be used to draft documents and collaborate on them with your colleagues. Once the document you are working on is final, it should be moved to an appropriate folder in the P Drive.

## **SharePoint**

A secure place to store, organize, share, and access information from any device. It allows users to create forms, processes, and even websites. It is the document filing system behind Teams—when you create a Team you create a SharePoint site unique to that Team.

- Easier document access and FOIA compliance with enhanced search via metadata tagging
- Accessibility (access information across approved devices without the need of a VPN) and availability (anytime, anywhere access to information)
- Version control and ease of connection with other Office 365 applications
- Significant financial savings

SharePoint is currently the application behind the <u>CGBGreen Bank</u> Intranet and our Forms page. Moving forward, SharePoint will be replacing the P Drive as the official storage location for all Green Bank documentation.

## Other CGBGreen Bank Data Management Platforms

In addition, there are other software solutions that the Green Bank has implemented to help us manage databases and support our programs. These include PowerClerk, NGEN, Intacct, and Salesforce. More detail around each is available below.

#### Powerclerk PowerClerk

PowerClerk is the database for the RSIP team. Contractors, System Owners, Inspectors, and Green Bank staff collaborate in PowerClerk to submit paperwork, calculate incentives, estimate system production, and track most aspects of residential solar PV projects that receive an RSIP incentive.

## <u>NGEN</u>

NGEN stands for National Green Energy Network and is a custom-designed software program that manages workflows for our residential Smart-E Loan program.

NGEN is a workflow management tool where all Smart-E contractor, lender, and project specific data reside. Contractors provide project level data, where Green Bank staff review, and approve each project to be financed. Staff use the NGEN platform to communicate to both lenders and contractors regarding approval for loan closings, and distribution of loan funds to the contractor. Lenders provide overall portfolio data to help staff manage the loan loss reserve and overall portfolio strength.

#### Sage Intacct

Sage Intacct is a cloud-based financial management system.

The Accounting team uses Sage Intacct to manage all Accounts Payable, Accounts Receivable and Employee Expense processing, as well as tracking of cash, PSA, investment, and Ioan balances. Sage Intacct is used to perform all necessary financial reporting. Green Bank senior management uses Sage Intacct to manage budget to actual spending and to review financial results.

#### **Salesforce**

Salesforce is a customer relationship management (CRM) platform. Based in the cloud, Salesforce allows users to configure their own applications to support sales, service, and marketing initiatives.

The Green Bank uses a custom-designed Salesforce platform for many purposes, including:

- Organization/Company information & Contact management
- C-PACE Lead tracking, organization & reporting
- Campaign monitoring
- Marketing communications
- Complete process management for C-PACE, including automations and workflows
- Project & financial data collection and organization for C-PACE and all commercial programs
- Lien filing tracking for C-PACE projects
- C-PACE billing contact information
- C-PACE Disbursement approvals through DocuSign App
- All C-PACE, Green Bank Solar PPA & MFH KPI data collection & reporting, including progress to targets
- External Salesforce Experience for C-PACE Contractors to submit data & documentation for technical underwriting & commissioning steps within the C-PACE process

# Vendor Management Policy

The Green Bank designs its processes and procedures for its IT infrastructure and application processing system to meet its objectives and reporting requirements. Those objectives are based on the commitments that the Green Bank makes to user entities, the laws and regulations that govern the provision of its services, and the financial, operational, and compliance requirements that the Green Bank has established.

Agreements with vendors include clearly defined terms, conditions, and responsibilities between the Green Bank and the vendor and are required to be executed prior to the commencement of a business relationship. Additional commitments are standardized and include, but are not limited to, the following:

- Criteria designed to permit users to access only the information they need based on their role
- Use of encryption technologies to protect confidential data
- Use of strong passwords and unique user IDs
- Implementation of a firewall and antivirus monitoring software
- Continuous monitoring of system performance
- Secure and timely backup and retention of data

SOC2 certification is highly preferred for any data/IT vendor. Designated Green Bank personnel will perform a review of the identified subservice organization's SOC report when they become available to ensure that key controls are designed appropriately and operating effectively and that they coordinate with the controls implemented at the Green Bank. If there is a vendor we want to work with and they are not SOC2 certified, we will work with our managed IT services partner to assess the risk inherent in a possible working relationship.

## Hardware

Employees issued portable (laptop, tablet) computers must take reasonable precautions. When out of the office the computer should always be under direct control of the employee or out of sight in a secure location. CGBGreen Bank may take other security measures including, but not limited to, computer tracking hardware/software, security cables, and/or hard drive encryption.

- Personal use of the company phone system should be kept to a minimum.
- AV equipment is available in all Conference rooms and is reserved using the calendar resource on Teams or in Outlook, selecting the room as a resource.
- All laptop users must carry their device in an adequately padded laptop case. Laptop sleeves, tote bags and any other un-cushioned bags are unacceptable.
- Printers must be handled with care. If a jam or other issue occurs and you cannot quickly fix the issue, the office manager or IT staff should be contacted to resolve the issue.

# Standard Configuration

Standard hardware and software configurations are used wherever possible to provide the best levels of reliability for the company network and computers. Other benefits of the standard configuration include the rapid replacement of faulty equipment with spare parts, the tracking of software licenses (as described in the preceding section) and the ability to plan for the implementation of new projects.

The configuration of company computers should not be changed in any way without the prior agreement of CGBGreen Bank management. In particular, new hardware devices, new software

and upgrades to existing software should only be installed under the guidance of CGBGreen Bank's IT staff.

## Data Security

All employees and staff (consultants, third-party contractors, and administrators) are assigned a network username and password when they join the company. The network will force employees and staff to change their password at regular intervals, the interval being determined by the network administrator. The network administrator will also impose other restrictions, such as password length and complexity requirements.

Employees must select network passwords that cannot be easily guessed or that appear in a standard dictionary. If it is necessary to create a written record of a password, that record should never be stored near the employee's desk and never associated with the employee's username. In general, passwords should be memorized and not recorded in writing.

Employees must password-protect all smartphones, tablets and other mobile devices that are paid for by CGBGreen Bank or contain sensitive or confidential business information.

## Privacy

CGB<u>Green Bank</u> respects your desire to work without the company being overbearing with respect to monitoring and control. However, detailed electronic records about your use of the PC, the network, email, and Internet are created, but not routinely reviewed by the company.

While the company does routinely gather logs for most electronic activities, they will typically be used for the following purposes:

- Cost analysis
- Resource allocation
- Optimum technical management of information resources
- Production analysis
- Detecting patterns of use that indicate users may be violating company policies or engaging in illegal activity

CGBGreen Bank reserves the right, at its discretion, to review any electronic files, logs, and messages to the extent necessary to ensure electronic media and services are being used in compliance with the law, this policy and other company policies. This includes the use of spot checks on Internet (Web) use, network files and email without prior notification or user interaction.

Software tools to identify possible breaches of this policy (e.g., highlighting access to websites with unacceptable content or emails containing abusive language) may be used. The results will be reported to the company management and thoroughly investigated where appropriate.

It should not be assumed that internal or external communications are totally private. Accordingly, particularly sensitive information should be transmitted by other means. Therefore, do not use the company network or mobile devices paid for by <u>CGBGreen Bank</u> for personal items that you would not want made public.

# Encryption

Only encryption software supplied by CGBGreen Bank for purposes of safeguarding sensitive or confidential business information may be used. People who use encryption files stored on a

company computer must provide their manager with a sealed hard copy record (to be retained in a secure location) of all the passwords and/or encryption keys necessary to access the files.

Power-on passwords should not generally be used but if they are, they are required to be approved by IT.

Please note: this means that employees must inform their supervisor of any passwords used to protect individual documents.

## File Storage

CGB<u>Green Bank</u> creates backup images of all email, server, and network file stores. These images are stored in a secure location and can be used in the event of:

- Accidental deletion of important material
- A "disaster" necessitating complete recovery of one or more of the company's systems

Data and other files created during the course of an employee's work should, therefore, be stored on the network.

## Personal Use

Computers and associated equipment are provided by <u>CGBGreen Bank</u> for employee's and staff's business use. The activities on information technology platforms provided by or paid for <u>CGBGreen Bank</u>, including computers, networks, internet connections, smartphones, tablets, and any mobile devices, may be monitored with or without your knowledge. You should have no expectation of privacy regarding the contents contained within such technology or device.

Only limited, occasional and incidental use for personal, non-business purposes is permissible at the discretion of the President. However, please be mindful of prohibited activities as described above in General Guidelines (i.e., shopping, music streaming, etc.) Limited, occasional, or incidental use is defined as use for less than 15 minutes during a workday.

Use of social networking sites (e.g., Facebook, Twitter, LinkedIn) at any time using company provided computers is prohibited, unless it is for company purposes and/or business. While at work, the impact to company resources can impact business operations, but also opens the device to possible security issues.

Personal laptops, cell phones and other internet-enabled items are permitted to be used; however reasonable restrictions of use may be exercised at HR/management discretion. <u>CGBGreen Bank</u> does not provide internet access for public/private use, except on an approved device/user basis. Please advise IT for further detailed instructions before attempting to connect any device to the <u>CGBGreen Bank</u> network.

Streaming media (internet Radio, YouTube, Hulu, Pandora, Spotify, etc.) uses significant resources and is prohibited for personal use. Please consider the impact of its use for business purposes only for all devices, including cell phones.

Company locations may provide a freely accessible public Wi-Fi connection that may be used by employees and staff, but CGBGreen Bank absolves itself of any and all damage, liability, etc. that arises from the use of third-party networks. It is the policy of CGBGreen Bank that if an employee chooses to use these third-party connections that they do so on their break, lunch, or after-hours and do not pursue personal activities during business hours.

## **Contract and freelance staff**

CGBGreen Bank will provide agency/temporary, contract/freelance staff with access to computers and the company computer systems for the sole purpose of fulfilling their contractual role with CGBGreen Bank. No personal use by these staff of computer and communication facilities provided by CGBGreen Bank is permitted at any time.

## Viruses/Spyware

All computer viruses/spyware must be reported immediately to IT. IT is responsible for verifying the updating of virus/spyware detection software from time to time and providing detailed guidelines in the event of a major problem. IT will also investigate any infection and must receive the full cooperation of all staff in attempting to identify the source. Any attempt to introduce viruses/spyware to the network through malice or negligence will be thoroughly investigated and will be dealt with according to HR guidelines and procedures.

#### **Mobile Devices**

Staff are permitted to access Green Bank email and phone lines using their personal device, working with the Green Bank's IT consultants. Personal access may be reimbursed per the Green Bank's Mobile Communications Policy. It is CGB policy that representatives of our organization who are issued a cellular phone understand that phones are issued for business use. It is anticipated that personal as well as business use will occur, however it is your responsibility to remember its intended use. Company-paid phones with data plans must be first approved by your supervisor and proper paperwork filed with Finance. Once this process is complete, the IT department will configure the device to connect to the server to retrieve mail, contacts, and your calendar. Levels of reimbursement will be set forth in accordance with CGB's Mobile Communications policy.

It is your responsibility to take care of the device and ensure its safety. If your device is lost or stolen, you must contact IT immediately so it can be remotely wiped of company data. <u>Upon an employee's departure from the Green Bank or at the discretion of management, the Green Bank and its IT consultants may remotely terminate mobile access and associated data. The Green Bank may also restore the device back to its factory settings.</u>

CGBGreen Bank has a zero-tolerance policy regarding using a cell phone and other mobile devices while driving. For the safety of our employees and others it is imperative that you pull over and stop at a safe location to dial, receive, text or converse on the cell phone in any way. Please consider the use of hands-free devices as allowed by Connecticut State Law.

Mobile devices equipped with cameras require special attention. No photography should occur where confidential information exists, nor where client information is stored. Areas where personal privacy exists (bathrooms, etc.) should be avoided with such devices entirely. Under no circumstances should photography occur at a client location without their permission.

## Tablets

Those who own such devices must have management approval to use them for company business and e-mail synchronization, just as for smartphones. Just as for synchronized phones, IT needs to be informed if your tablet has been lost or put into the wrong hands or if you are getting rid of the device as they need to wipe it of company data.

## Company Data

The Information Technology department is responsible for protecting company data. This includes all data on the servers, as well as on other devices such as laptops, desktops, mobile devices,

and multifunction printers. The IT department backs up all data on the servers on a daily, weekly, and monthly schedule and retains this data under the company-approved Backup Policy.

The following are not permitted:

- Backing up company data on your own.
  - Having company data on your personal equipment, this includes the following:
    - Personal PCs laptops or desktops, tablets, smartphones, or other mobile devices.
    - Personal USB devices, such as memory sticks, MP3 players, hard drives, or other recording devices.
- Sending company data via e-mail to your or another CGBGreen Bank employee's personal email account.
- Accessing another employee's hardware, computer files or email without prior permission from employee or appropriate manager.
  - Sharing your logon password with anyone except the IT staff.
    - The system will ask to reset your password every 90 days.

If you telecommute, all work must be done on company equipment. If you are not using a company-owned laptop, a loaner PC can be arranged through the office manager or IT department with proper advanced notice to accommodate your needs. No personal devices may be attached to company hardware without prior approval by the IT department (i.e., printers, hard drives, etc.).

It is permissible to transfer items such as presentations and documents to a recording device for the sole purpose of collaboration with approved clients or customers pertaining to company business.

Access to the Internet at CGBGreen Bank is a resource and use thereof is subject to the same rules as other CGBGreen Bank resources. It is the responsibility of the user to make sure that all use of the Internet is authorized, appropriate and to the benefit of CGBGreen Bank. Each individual with access to the Internet is responsible for controlling its use. The use of the Internet is a privilege, not a right, which can be revoked at any time.

# **Social Media**

These guidelines apply to <u>CGBGreen Bank</u> employees, temporary employees and contractors who create or contribute to blogs, wikis, social networks, virtual worlds, or any other kind of social media for both professional and personal use.

## Overview

Social networks are fundamentally changing the way people communicate, conduct research, and make purchasing decisions. As an organization, <u>CGBGreen Bank</u> is engaged in these communities as they are appropriate and relevant to our clients and the Marketing department has developed a strategy for our Social Media Platform. We encourage you to learn how you can use social media to help us share the exciting things we are doing with our clients, uncover new opportunities and strengthen the perception of <u>CGBGreen Bank</u>'s staff as innovative professionals—people who work for a company that our clients trust and want to do business with.

Marketing does not exist in a vacuum within the Marketing department; every interaction our clients, prospective clients and partners have with us can strengthen or harm our brand. Therefore, social media should not be thought of just as a marketing tool. While it can be a vehicle

for organizations to publish content, it can also be a way for the people who make up those organizations to build and maintain relationships with clients and business partners.

You might be thinking "I already know how to use social media. What else do I need to know?" As the lines between personal and business communications become increasingly blurred, there are a few important points we would like you to consider when using social media in the capacity of your job.

1. You don't have to participate if you don't want to.

Unless you are in marketing, using social media is not likely to be an official part of your job role. We respect that some people prefer not to participate in social networking or are unsure if they want to mix personal and professional networks. Don't worry, there's no pressure to participate.

2. Be honest and transparent about your role.

If you publish something or respond to something about <u>CGBGreen Bank</u>, make sure to include your real name and it is understood that you are a <u>CGBGreen Bank</u> employee so there is no conflict of interest. There are several easy ways to do this, such as listing <u>CGBGreen Bank</u> as your place of employment on your profile or starting your comment with something like" "Disclaimer: I work for <u>CGBGreen Bank</u>", but regardless of your method, your audience will appreciate your transparency.

3. Know what the official lines of communication are and when to defer to them.

There is a significant difference between speaking *about* CGBGreen Bank and speaking *on behalf* of CGBGreen Bank. CGBGreen Bank has official means to publish information when it needs to and only a few people are authorized to do so via social media, the press, or any other venue. On your own blogs or social profiles, you can use simple statements such as "The postings on this site are my own and don't necessarily represent CGBGreen Bank's positions, strategies or opinions" to make it clear you are not speaking on behalf of CGBGreen Bank.

If you are not authorized to speak on behalf of CGBGreen Bank and receive requests for official comments or are unsure if you should respond to an inquiry, defer to the Marketing department.

Social media can be a forum for customers to share negative comments about an organization. CGBGreen Bank monitors our social profiles daily and has official means of diffusing and responding to these situations. Our policy is to respond promptly and openly and to take the conversations offline. If you see a negative comment or a situation that concerns you, do not respond directly, but report it to your supervisor and/or Marketing and it will be addressed quickly and professionally.

4. Remember our core values and follow our general code of conduct.

You should use your best judgment and consider <u>CGBGreen Bank</u>'s values of integrity, accountability, and professionalism as a guide for your conduct in online communities, just as they are a guide for other professional behavior. You are personally responsible for the content you post on any social network. These forums are public, are often searched and indexed, and should be treated as though they will be available for public viewing forever. If you aren't sure whether certain content should be published or discussed, ask before you post.

Know and follow our Code of Conduct and never share any confidential or proprietary information belonging to CGBGreen Bank or any other organization. Never comment on

anything related to legal matters, litigation, or any parties CGBGreen Bank may be in litigation with. Postings must respect copyright, privacy, fair use, financial disclosure, and other applicable laws. Only Marketing may post or authorize the posting of pictures, videos, and other media produced on the business premises or outside events. CGBGreen Bank reserves the right to request that certain subjects be avoided, withdraw certain posts, and remove inappropriate comments. If such employee denies or does not comply, proper legal action will be taken. When in doubt, feel free to run by Marketing or Human Resources.

5. Think before you post.

Use common sense when it comes to verbiage and tone in written online content. While social media is, in some cases, less formal than traditional business communications, <u>CGBGreen Bank</u> uses social media as a professional extension of our business. Do not use ethnic slurs, insults, or otherwise inappropriate and unprofessional language that would not be acceptable in the workplace. Respect the privacy of others and avoid potentially inflammatory topics.

Above all else, seek to add value in your participation. Our clients are looking for your information, insight, and expert perspective. Bashing competitors and posting negative comments about work, our clients, or our partners violates our Code of Conduct and adds nothing positive to an online dialogue. Think before you post and ask yourself if you are making a situation better or worse by doing so. Answering questions, sharing resources, and talking about your experiences are a great way to add value.

6. Online activities should not interfere with your job.

Social media, like, the Internet, can quickly change from a worthwhile tool to a distraction. Make sure your online activities do not interfere with your job or your commitments to our clients. In addition, social media sites may not be accessed on company hardware for personal reasons.

# All employees must review these policies and sign the Information Technologies Policies acknowledgement form found in the Appendix and return it to Human Resources.

# **Solicitation and Distribution**

All <u>CGBGreen Bank</u> employees are entitled to the opportunity to perform their work without being bothered or disturbed. Accordingly, we have adopted the following solicitation and distribution rule.

# **Non-Employees**

Anyone who is not an employee of CGBGreen Bank is prohibited from soliciting or distributing literature on CGBGreen Bank premises at any time.

# Employees

The <u>CGBGreen Bank</u> Solicitation and Distribution policy as it relates to current employees is as follows:

- Employees may not engage in solicitation or distribution of literature during working time. "Working time" means actual working time during the workday and includes both the working times of an employee doing the soliciting or of an employee being solicited. Working time does not include lunch periods, work breaks, or any other period in which employees are not on duty.
- Employees may not distribute literature concerning matters other than those directly related to CGBGreen Bank business in work areas at any time.

• Employees may not engage in verbal solicitation or distribution of literature at any time in those areas normally frequented by clients carrying on CGBGreen Bank business.

# **Bulletin Boards**

Bulletin boards are important as communications tools to alert you to CGBGreen Bank programs and activities. The posting of written solicitations of any kind on bulletin boards is restricted. Only notices relating to CGBGreen Bank-sponsored activities may be posted on bulletin boards. These bulletin boards display important information, and employees should consult them frequently for:

- Employee announcements
- Internal memoranda
- Job openings
- Organization announcement.
- Workplace Violence Policy Memorandum

# VIOLENCE IN THE WORKPLACE PREVENTION POLICY SUMMARY

Below is <u>CGBGreen Bank</u>'s policy concerning workplace violence and prohibiting weapons and dangerous instruments in the workplace.

The policy is consistent with what has been called a "Zero Tolerance" approach. Violence or the threat of violence by or against any employee of the State of Connecticut, including <u>CGBGreen</u> <u>Bank</u>, is unacceptable and will subject the perpetrator to serious disciplinary action and possible criminal charges.

CGB<u>Green Bank</u> is committed to providing its employees a safe and healthy work environment, free from intimidation, harassment, threats, and/or violent acts.

The worksite is any location, either permanent or temporary, where an employee performs any work-related duty. This includes but is not limited to the building and the surrounding perimeter, including the parking lot. It includes all state-owned and leased space, including vehicles and any location where state business is conducted.

According to the National Institute for Occupational Safety and Health (NIOSH), workplace violence is defined as:

"any physical assault, threatening behavior or verbal abuse occurring in the work setting. It includes, but is not limited to beatings, stabbings, suicides, shootings, rapes, near suicides, psychological traumas such as threats, obscene phone calls, an intimidating presence, and harassment of any nature such as being followed, sworn at, or shouted at."

There is no such thing as a "joke" when dealing with this subject. It is not funny when employees speak about "going postal", "getting" another employee or anything remotely similar.

Do not ignore violent, threatening, harassing, intimidating, or other disruptive behavior. If you observe or experience such behavior by anyone on Authority premises, whether <u>they are he or she is a CGBGreen Bank</u> employee or not, report it immediately to a supervisor or manager.

The cooperation of all <u>CGBGreen Bank</u> staff is needed to implement this policy effectively and maintain a safe working environment.

# VIOLENCE IN THE WORKPLACE PREVENTION POLICY

The State of Connecticut has adopted a statewide zero tolerance policy for workplace violence. The Connecticut Green Bank fully supports this policy and recognizes the right of its employees to work in a safe and secure environment that is characterized by respect and professionalism.

## **Prohibited Conduct**

Except as may be required as a condition of employment:

No employee shall bring into any state worksite any weapon or dangerous instrument as defined herein.

No employee shall use, attempt to use, or threaten to use any such weapon or dangerous instrument in a state worksite.

No employee shall cause or threaten to cause death or physical injury to any individual in a state worksite.

In addition, the Connecticut Green Bank prohibits all conduct, either verbal or physical, that is abusive, threatening, intimidating, or demeaning.

#### Definitions

"Weapon" means any firearm, including a BB gun, whether loaded or unloaded, any knife (excluding a small pen or pocketknife), including a switchblade or other knife having an automatic spring release device, a stiletto, any police baton or nightstick, or any martial arts weapon or electronic defense weapon.

"Dangerous instrument" means any instrument, article, or substance that, under the circumstances, is capable of causing death or serious physical injury.

#### **Confiscation of Weapons and Dangerous Instruments**

Any weapon or dangerous instrument at the worksite will be confiscated and there is no reasonable expectation of privacy with respect to such items in the workplace.

#### **Reporting Procedures**

**Emergency Situations:** Any employee who believes that there is a serious threat to <u>his/hertheir</u> safety or the safety of others that requires immediate attention should contact **911**. The employee must also contact <u>his/hertheir</u> **immediate supervisor** or **Human Resources** at (860) 258-7861 or the Managing Director of Operations at 860-257-2897.

Please note that when 911 is dialed from a hard line, the local police authority will respond. When dialing from a cell phone, 911 will connect you directly to the nearest State Police Troop.

**Non-Emergency Situations:** any employee who feels subjected to or witnesses violent, threatening, harassing, or intimidating behavior in the workplace should immediately report the incident or statement to <u>his/hertheir</u> supervisor or manager or Human Resources.

**Supervisors/Managers Responsibilities:** Any manager or supervisor who receives a report of violent, threatening, harassing, or intimidating behavior shall immediately contact the Human Resources Office so that office may evaluate, investigate, and take appropriate action.

#### **Investigation and Corrective Action**

CGBGreen Bank will promptly investigate all reports or alleged incidents of violent, threatening, harassing, or intimidating behavior.

All employees are expected to cooperate fully in all such investigations.

Any employee suspected of violating this policy may be placed immediately on administrative leave pending the results of the investigation.

If the claims of violent, threatening, harassing, or intimidating conduct are substantiated, or if it is found that the employee has otherwise violated this policy, the employee will be dealt with through the appropriate disciplinary process, and may be subject to discipline up to and including dismissal from CGBGreen Bank.

Where the situation warrants, <u>CGBGreen Bank</u> will request that the appropriate law enforcement agencies become involved in the investigation of the matter, and <u>CGBGreen Bank</u> may seek prosecution of conduct that violates the law.

## **Enforcement of the Policy**

This policy will be prominently posted for all agency employees.

President & CEO

# **Disciplinary Procedure**

**CGB**<u>Green Bank</u> believes each employee should be treated and respected as an individual. Therefore, employee misconduct is approached in a case-by-case manner. Some infractions are more serious than others are and an employee's length of service, work record, and prior conduct are all important in determining the proper disciplinary action. It is our general practice to use progressive disciplinary counseling procedures between the employee and their immediate supervisor, in which the supervisor will explain the allegations and allow the employee to explain their position. In all phases of the disciplinary procedure, CGBGreen Bank will make reasonable efforts to give the employee the opportunity to make their position clear, orally or in writing. Some serious incidents of misconduct may require immediate discharge from employment, but whenever possible, misconduct will be approached with counseling before termination of employment is considered. The primary purpose of discipline is remedial, not punitive. When possible and appropriate the steps of progressive discipline will be as follows:

- 1. A verbal (oral) warning giving clear guidelines for corrective action and potential consequences.
- 2. A written warning with the infraction and required corrective action specified.
- 3. A written reprimand is issued when the employee has been warned and the problem behavior has not been corrected.
- 4. A suspension without pay serves as the last resort prior to discharge.
- 5. A demotion results when an employee is willing but unable to perform assigned duties.
- A termination of employment usually follows prior disciplinary steps or for a serious rule violation.

When disciplinary action is required upon the recommendation of the Supervisor, the President and CEO and/or his-their designee may elect a written reprimand, suspension without pay demotion, disciplinary probation, or dismissal. The President and CEO and/or his-their designee may take any such disciplinary action after the evaluation process determines that an employee's performance and/or conduct is unacceptable, taking any mitigating circumstances into account. A record of the written reprimand or documentation of other disciplinary action will be made a permanent part of the employee's personnel file.

Management reserves the right to enter into any level of disciplinary action or termination based upon the severity of the offense requiring discipline and the employee's past work record. This policy in no way alters the at-will employment policy; the employee or CGBGreen Bank may terminate the employment relationship at any time and for any reason.

# **Employment Termination**

Termination of employment is an inevitable part of personnel activity within any organization, and many of the reasons for termination are routine. Below are examples of some of the most common circumstances under which employment is terminated:

# Resignation

Employment termination initiated by an employee who chooses to leave CGBGreen Bank voluntarily.

## Discharge

Employment termination initiated by CGBGreen Bank.

# Layoff

Involuntary employment termination initiated by CGBGreen Bank for non-disciplinary reasons.

# Retirement

Voluntary retirement from active employment status initiated by the employee.

## **Exit Interview**

CGBGreen Bank will generally schedule exit interviews at the time of employment termination. The exit interview will afford an opportunity to discuss such issues as employee benefits, conversion privileges, repayment of outstanding debts to CGBGreen Bank, return of CI-owned property, and assuring that necessary assignments are completed. Suggestions, complaints, and questions can also be voiced.

Employee benefits will be affected by employment termination in the following manner. All accrued, vested benefits that are due and payable at termination will be paid. Some benefits may be continued at the employee's expense if the employee so chooses. The employee will be notified in writing of the benefits that may be continued and of the terms, conditions, and limitations of such continuance

## **Grievance Procedure**

Supervisors are responsible for being accessible and for regularly discussing working conditions, job performance, or any other concern an employee has about <u>his/hertheir</u> job at <u>CGBGreen Bank</u> making reasonable efforts to address problems and concerns. Our success depends upon maintaining clear and open communication with employees. It is of utmost importance to respond to complaints, problems, or anything employees deem unfair or unacceptable. Each employee should feel free to discuss any complaint or problem with their immediate supervisor. This initial step in the grievance procedure is informal to encourage a quick resolution. No employee will be penalized or discriminated against for bringing up a problem or registering a grievance regardless of the nature of the complaint.

## **Grievances Not Involving Discrimination or Sexual Harassment**

If an employee has a grievance that remains unresolved in informal discussions with their supervisor, they should make a scheduled, recorded appointment with their supervisor to discuss the problem. The employee and supervisor should keep a written record of this discussion.

If a settlement satisfactory to both parties cannot be reached, the employee and their supervisor should submit the grievance in writing to the President and CEO and/or his-their designee, attaching their written records of the meeting. The President and CEO and/or their designee will schedule a meeting with the employee and the supervisor within five (5) working days of receipt of the grievance. A written record of this meeting will also be kept, and the President and CEO and/or his-their designee will render a decision within three (3) working days after the meeting.

In the event the employee is not satisfied with the decision of the President <u>and CEO</u> and/or <u>their-his</u> designee, they may request a hearing before the Board of Director's Budget and Operations Committee. The decision of the Budget and Operations Committee shall be final.

## **Grievances Involving Discrimination or Sexual Harassment**

Any employee who feels they would like counseling about possible violations of CGBGreen Bank affirmative action or anti-harassment policies, or any state or federal statutes related to Equal Employment Opportunity (EEO), Affirmative Action (AA), or Sexual Harassment should contact Human Resources. This counseling will be kept confidential and no related information will be released except upon signed consent of the employee or as necessary for CGBGreen Bank to comply or fulfill its obligations under federal or state law. Human Resources will provide information on state, federal agencies and CGBGreen Bank resources available to employees who wish to pursue a grievance regarding discrimination.

If a grievance involves sexual harassment by the employee's supervisor, or if there are other circumstances that make it impossible for the employee to initially address a grievance directly to the supervisor, <u>they he/she</u> may schedule the initial meeting with the President <u>and CEO</u> and/or <u>theirhis</u> designee. If the employee's supervisor is the President <u>and CEO</u> and/or <u>his-their</u> designee, the grievance may be directed to the Budget and Operations Committee.

## **Grievance Procedure Contacts**

Separate and independent from the above process, the complainant may file written complaints of discrimination with:

The Connecticut Commission on Human Rights and Opportunities (CHRO) 21 Grand St, Hartford, CT 06106 Phone: (860) 541-3400

The Equal Employment Opportunity Commission (EEOC) 150 Causeway St, Boston, MA. 02114 Phone (617) 565-3214

Department of Justice (DOJ) Office on the Americans with Disabilities Act Civil Rights Division, P.O. Box 66118, Washington, D.C. 20507 Phone (202) 514-0301.

Employees may also file complaints with any other agencies, state, federal or local, including the United States Department of Labor, Wage and Hour Division, that enforce laws concerning discrimination in employment. Employees should be aware that there are statutes of limitations that require complaints be filed by a certain time period or the employee may forfeit <u>their his or her</u> rights. Employees may inquire further with the respective agency.

No individual who files a complaint, or who cooperates or testifies in the investigation of a complaint, shall be unlawfully retaliated against for the exercising of their legal rights.

## **Whistleblower Policy**

Any person having knowledge of corruption, unethical practices, violation of state laws or regulations, mismanagement, gross waste of funds, abuse of authority, or danger to the public safety occurring within CGBGreen Bank or in a related contract with CGBGreen Bank may disclose such matter to any member of the Audit Compliance and Governance Committee of CGBGreen Bank or the state Auditors of Public Accounts. A person disclosing such information is known in lay terms as a "whistleblower." A whistleblower should feel free to report such information without fear of retaliation.

No <u>CGBGreen Bank</u> officer or employee, may take or threaten to take any personnel action against <u>a whistleblower who is an employee of CGBGreen Bank in retaliation for disclosing such information</u>. Whistleblower's protection applies to any <u>CGBGreen Bank</u> employee who discloses such information:

- (1) to any employee of the Auditors or of the Attorney General.
- (2) to any member of the Audit, Compliance and Governance committee of CGBGreen Bank.
- (3) to an employee of the state or quasi-public agency that employs the person who retaliated or threatened retaliation.
- (4) to an employee of a state agency pursuant to a mandated reporter statute; or,

(5) in the case of a large state contractor, to an employee of the contracting state agency concerning information about a large state contract.

A <u>CGBGreen Bank</u> employee who believes <u>they are he or she is</u> the subject of retaliation for "whistleblowing" may file a "whistleblower retaliation complaint" with the Chief Human Rights Referee at the CHRO's Office of Public Hearings <u>not later than thirty (30) days after the employee learns of the specific incident giving rise to the claim (i.e., the personnel action threatened or taken against him/her). An employee who believes that <u>they havehe or she has</u> been retaliated against should contact a private attorney to discuss <u>his/hertheir</u> rights. The Attorney General cannot provide legal advice or counsel.</u>

CGBGreen Bank's guidelines for making whistleblower complaints are set forth below.

- File a written complaint or verbal complaint with the CEO and/or the Ethics Officer, and or the CGBGreen Bank Audit, Compliance, and Governance Committee. Employees may also choose to file a written complaint or make a telephone complaint with the Auditors of Public Accounts. All complaints should be filed in writing with the Auditors of Public Accounts, 210 Capitol Avenue, Hartford, CT 06106, or by telephone: Toll Free within Connecticut: (800) 797-1702 or Locally: (860) 240-5305. If the employee wishes to remain anonymous, they may.
- Whistleblower complaints will be referred to the <u>CGBGreen Bank</u> Audit, Compliance, and Governance Committee for review. That committee will serve as the primary contact between <u>CGBGreen Bank</u> and the Auditors of Public Accounts.

Employees can visit <u>Auditors of Public Accounts</u> website for more information about filing a complaint. In addition, employees may visit the <u>Commission on Human Rights and Opportunities</u> website for information regarding the processes and procedures in the administration of whistleblower retaliation complaints.

# THE CONNECTICUT GREEN BANK ETHICAL CONDUCT POLICY

# I. Introduction

Ethical conduct is a core value of The Connecticut Green Bank (CGBGreen Bank) and all employees and officials of CGBGreen Bank are expected to maintain the highest professional standards in the conduct of their duties. In particular, each person is responsible for, and should become familiar with, the Code of Ethics for Public Officials. A copy of the "Guide to the Code of Ethics for Public Officials" is attached here. You may also access both the Code and the guide on the Office of State Ethics website at www.ct.gov/ethics by clicking on "Public Information".

# II. Code of Ethics Compliance

Principle provisions of the Code of Ethics for Public Officials include:

- **GIFTS** In general, state employees are prohibited from accepting gifts from anyone doing business with, seeking to do business with, or directly regulated by the state employee's agency or department or from persons known to be a registered lobbyist or lobbyist's representative. There are also restrictions on gifts between state employees in certain circumstances. (See the "Guide to the Code of Ethics for Public Officials" and Statutory References below, Sections 1-79(e) and 1-84(m).)
- **FINANCIAL BENEFIT** A state employee is prohibited from using his/hertheir office or non-public information obtained in state service for the financial benefit of the individual, certain family members, or that of an associated business.
- **OUTSIDE EMPLOYMENT -** A state employee may not accept outside employment which will impair <u>his/hertheir</u> independence of judgment as to official state duties or which would induce the disclosure of confidential information. Generally, outside employment is barred if the private employer can benefit from the state employee's official actions.
- **FINANCIAL DISCLOSURE** Certain state employees are required to file a financial disclosure statement with the State Ethics Commission. This statement will be considered public information.
- RECUSAL OR REPORTING IN CASE OF POTENTIAL CONFLICTS The Code of Ethics requires that public officials and state employees avoid potential conflicts of interest. If a public official or state employee would be required to take official action that would affect a financial interest of such public official or state employee, certain family members or a business with which they are associated, they must excuse themselves from the matter or prepare and file a sworn written statement explaining why continued involvement in the matter would be on an objective basis and in the public interest despite the potential conflict. (See Statutory References below, Section 1-86(a).)

# III. Additional CGBGreen Bank Policies

CGBGreen Bank expects that, in addition to complying with all provisions of the Code of Ethics for Public officials, employees and officials will:

- Protect the confidential information to which CGBGreen Bank has access.
- Avoid actual or potential conflicts of interest.

- Neither interfere with nor solicit contracts on behalf of any person.
- Avoid, in the case of employees, outside employment which may compromise or interfere with the ability to perform duties for CGBGreen Bank; and
- For those employees subject to the requirements of C.G.S. 1-83(a), submit the Statement of Financial Interests disclosure documents to the Office of State Ethics in a timely manner.

For the same reasons, and in order to maintain public confidence and avoid even an appearance of impropriety

- CGBGreen Bank employees and members of their immediate families are prohibited from investing in companies that receive financial assistance from CGBGreen Bank; and
- If an application for financial assistance from <u>CGBGreen Bank</u> is received from a business with which a <u>CGBGreen Bank</u> employee is associated, or in which such employee or an immediate family member has a direct financial interest, such employee, whether or not <u>they he or she expects</u> to be involved in the processing or consideration of such application, shall notify the President of such business association or financial interest and such employee shall be sequestered from all information, discussions, actions and other activities related to such application. For this purpose, a business with which such employee is associated has the same meaning assigned in Section 1-79 of the Code of Ethics to the phrase "business with which he is associated". (See Statutory References below, Section 1-79(b).)

For these purposes, <u>CGBGreen Bank</u> may post a "restricted list" of companies in which employees may not invest and may require employees to disclose outside business interests. The rules of conduct in these matters may also be covered in more detail in the <u>CGBGreen</u> <u>Bank</u> Handbook.

# IV. Post-State Employment Restrictions

Employees leaving the Connecticut Green Bank are required to comply with the Code of Ethics provisions pertaining to post-state employment, which are commonly known as the "revolving door" provisions. For example, there are restrictions on accepting employment with a party to certain contracts (which would include contracts relating to investments or other financial assistance) if the employee or official were involved in the negotiation or award of the contract, and restrictions on representing other parties before CGBGreen Bank during the one-year period following departure from state service. Employees should familiarize themselves with the statutes pertaining to post-state employment. They can be found at C.G.S. Section 1-84a and 1-84b. (See Statutory References below.) You may access these statutes on the Office of State Ethics website at www.ct.gov/ethics by clicking on "Statutes and Regulations". A summary of these requirements is included in the "Guide to the Code of Ethics for Public Officials and State Employees" attached to this ethics policy.

Before an employee leaves the employment of The Connecticut Green Bank, an exit interview will be conducted by our Ethics Liaison Officer. The purpose of this exit interview will be to individually review potential issues relating to post-Connecticut Green Bank employment.

# V. <u>Other Matters</u>

The Board of the Connecticut Green Bank continues to have well-justified faith in the integrity and ethical conduct of employees and officials of the Connecticut Green Bank. It is understood

however, that breaches of this ethics policy may require disciplinary action, including but not limited to dismissal from <u>CGBGreen Bank</u>, in addition to sanctions provided by state law. Such sanctions are to be applied as appropriate with the approval of the Connecticut Green Bank Board of Directors.

It is the responsibility of each employee and official to inquire of the Ethics Liaison Officer or the Office of State Ethics at 860.566.4472 should any question arise concerning <u>theirhis or her</u> conduct.

## VI. <u>Statutory References</u>

Sec. 1-79. <u>Definitions</u>. The following terms, when used in this part, shall have the following meanings unless the context otherwise requires:

(b) "Business with which he is associated" means any sole proprietorship, partnership, firm, corporation, trust or other entity through which business for profit or not for profit is conducted in which the public official or state employee or member of his immediate family is a director, officer, owner, limited or general partner, beneficiary of a trust or holder of stock constituting five per cent or more of the total outstanding stock of any class, provided, a public official or state employee, or member of his immediate family, shall not be deemed to be associated with a not for profit entity solely by virtue of the fact that the public official or state employee or member of his immediate family is an unpaid director or officer of the not for profit entity. "Officer" refers only to the president, executive or senior vice president or treasurer of such business.

(e) "Gift" means anything of value, which is directly and personally received, unless consideration of equal or greater value is given in return. "Gift" shall not include:

(1) A political contribution otherwise reported as required by law or a donation or payment as described in subdivision (9) or (10) of subsection (b) of section 9-601a;

(2) Services provided by persons volunteering their time, if provided to aid or promote the success or defeat of any political party, any candidate or candidates for public office or the position of convention delegate or town committee member or any referendum question;

(3) A commercially reasonable loan made on terms not more favorable than loans made in the ordinary course of business;

(4) A gift received from (A) an individual's spouse, fiancé or fiancée, (B) the parent, brother or sister of such spouse or such individual, or (C) the child of such individual or the spouse of such child;

(5) Goods or services (A) which are provided to a state agency or quasi-public agency (i) for use on state or quasi-public agency property, or (ii) that support an event, and (B) which facilitate state or quasi-public agency action or functions. As used in this subdivision, "state property" means (i) property owned by the state or a quasi-public agency, or (ii) property leased to a state agency or quasi-public agency;

(6) A certificate, plaque or other ceremonial award costing less than one hundred dollars;

(7) A rebate, discount or promotional item available to the general public;

(8) Printed or recorded informational material germane to state action or functions;

(9) Food or beverage or both, costing less than fifty dollars in the aggregate per recipient in a calendar year, and consumed on an occasion or occasions at which the person paying, directly or indirectly, for the food or beverage, or his representative, is in attendance;

(10) Food or beverage or both, costing less than fifty dollars per person and consumed at a publicly noticed legislative reception to which all members of the General Assembly are invited and which is hosted not more than once in any calendar year by a lobbyist or business organization. For the purposes of such limit, (A) a reception hosted by a lobbyist who is an individual shall be deemed to have also been hosted by the business organization which he owns or is employed by, and (B) a reception hosted by a business organization shall be deemed to have also been hosted by a business organization who are lobbyists. In making the calculation for the purposes of such fifty-dollar limit, the donor shall divide the amount spent on food and beverage by the number of persons whom the donor reasonably expects to attend the reception;

(11) Food or beverage or both, costing less than fifty dollars per person and consumed at a publicly noticed reception to which all members of the General Assembly from a region of the state are invited and which is hosted not more than once in any calendar year by a lobbyist or business organization. For the purposes of such limit, (A) a reception hosted by a lobbyist who is an individual shall be deemed to have also been hosted by the business organization which he owns or is employed by, and (B) a reception hosted by a business organization shall be deemed to have also been hosted by a business organization shall be deemed to have also been hosted by a business organization shall be deemed to have also been hosted by all owners and employees of the business organization who are lobbyists. In making the calculation for the purposes of such fifty-dollar limit, the donor shall divide the amount spent on food and beverage by the number of persons whom the donor reasonably expects to attend the reception. As used in this subdivision, "region of the state" means the established geographic service area of the organization hosting the reception;

(12) A gift, including but not limited to, food or beverage or both, provided by an individual for the celebration of a major life event [Not an available exception; see Section 1-84(m) below];

(13) Gifts costing less than one hundred dollars in the aggregate or food or beverage provided at a hospitality suite at a meeting or conference of an interstate legislative association, by a person who is not a registrant or is not doing business with the state of Connecticut;

(14) Admission to a charitable or civic event, including food and beverage provided at such event, but excluding lodging or travel expenses, at which a public official or state employee participates in his official capacity, provided such admission is provided by the primary sponsoring entity;

(15) Anything of value provided by an employer of (A) a public official, (B) a state employee, or (C) a spouse of a public official or state employee, to such official, employee or spouse, provided such benefits are customarily and ordinarily provided to others in similar circumstances;

(16) Anything having a value of not more than ten dollars, provided the aggregate value of all things provided by a donor to a recipient under this subdivision in any calendar year shall not exceed fifty dollars; or

(17) Training that is provided by a vendor for a product purchased by a state or quasi-public agency which is offered to all customers of such vendor.

#### Section 1-84 Prohibited Activities

(m) No public official or state employee shall knowingly accept, directly or indirectly, any gift, as defined in subsection (e) of section 1-79, from any person the official or employee knows or has reason to know: (1) Is doing business with or seeking to do business with the department or agency in which the official or employee is employed; (2) is engaged in activities which are directly regulated by such department or agency; or (3) is prequalified under section 4a-100. No person shall knowingly give, directly or indirectly, any gift or gifts in violation of this provision. For the purposes of this subsection, the exclusion to the term "gift" in subdivision (12) of subsection (e) of section 1-79 for a gift for the celebration of a major life event shall not apply. Any person prohibited from making a gift under this subsection shall report to the State Ethics Commission any solicitation of a gift from such person by a state employee or public official.

#### Section 1-84a. Disclosure or use of confidential information by former official or employee

No former executive or legislative branch or quasi-public agency public official or state employee shall disclose or use confidential information acquired in the course of and by reason of his official duties, for financial gain for himself or another person.

#### Sec. 1-84b. Certain activities restricted after leaving public office or employment

(a) No former executive branch or quasi-public agency public official or state employee shall represent anyone other than the state, concerning any particular matter (1) in which he participated personally and substantially while in state service, and (2) in which the state has a substantial interest.

(b) No former executive branch or quasi-public agency public official or state employee shall, for one year after leaving state service, represent anyone, other than the state, for compensation before the department, agency, board, commission, council or office in which he served at the time of his termination of service, concerning any matter in which the state has a substantial interest. The provisions of this subsection shall not apply to an attorney who is a former employee of the Division of Criminal Justice, with respect to any representation in a matter under the jurisdiction of a court.

(f) No former public official or state employee (1) who participated substantially in the negotiation or award of (A) a state contract valued at an amount of fifty thousand dollars or more, or (B) a written agreement for the approval of a payroll deduction slot described in section 3-123g, or (2) who supervised the negotiation or award of such a contract or agreement, shall accept employment with a party to the contract or agreement other than the state for a period of one year after his resignation from his state office or position if his resignation occurs less than one year after the contract or agreement is signed.

(g) No member or director of a quasi-public agency who participates substantially in the negotiation or award of a contract valued at an amount of fifty thousand dollars or more, or who supervised the negotiation or award of such a contract, shall seek, accept, or hold employment with a party to the contract for a period of one year after the signing of the contract.

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SECTION 8 HEALTH AND SAFETY

# **Health and Safety**

Each employee is expected to share our commitment to a safe workplace. This obligation means that safe working habits and principles must be followed. All employees are expected to exercise common sense and good housekeeping practices. For the sake of all our employees and clients, safety concerns must be taken seriously. Every employee is expected to take a proactive role in providing a safe workplace. Horseplay or other unsafe activity is prohibited. Every employee must report any injury, no matter how slight, immediately to <u>their his or her</u> supervisor. Such reports are necessary to initiate any necessary emergency procedures, to comply with workers compensation laws, and to initiate insurance and workers compensation benefits procedures.

#### First-aid kits containing items needed for most minor first-aid situations are maintained

**throughout the building.** All employees should make a note of their locations. Each employee is expected to exercise safe working habits and reasonable caution in all work activities. Any unsafe condition must be reported immediately to the appropriate supervisor. Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report, or where appropriate, remedy such situations, may be subject to disciplinary action.

# Policy On Life-Threatening and Communicable Diseases

This policy provides guidance for dealing with work situations involving employees, who have life threatening and communicable diseases, including but not limited to:

- Acquired Immune Deficiency Syndrome (AIDS).
- Human Immunodeficiency Virus (HIV) infection.
- HIV related illness as defined by the Connecticut General Statutes Section I9a58 1; or
- Any other life threatening and communicable disease.

## **Non-Discrimination**

CGBGreen Bank does not unlawfully discriminate against qualified individuals with lifethreatening and communicable diseases in any terms or conditions of employment.

It is our policy that individuals with life-threatening and communicable diseases will be treated with the same compassion and consideration given to any employee with a health problem. No person will be treated differently in the workplace as a result of having or being perceived as having such a disease.

# No H.I.V. Or Aids Testing

Present or prospective employees will not be required to submit to an AIDS or HIV-related test as a condition of hiring or continued employment.

# **Ability To Work**

CGBGreen Bank recognizes that employees with life-threatening and communicable diseases may require a reasonable accommodation to perform their job duties. It is CGBGreen Bank's policy to accommodate these employees by allowing them to work as long as they are able to perform their essential job functions, with or without reasonable accommodation, provided that medical evidence indicates that their conditions do not pose a direct threat to themselves or others.

#### **Employee Health and Safety**

CGBGreen Bank also recognizes its obligation to provide a safe and healthy work environment for all employees. Therefore, CGBGreen Bank may obtain appropriate medical direction, when necessary, to ensure that an employee's condition does not pose a significant risk of substantial harm to him/herself or to other employees or customers of the Agency.

## Confidentiality

All employee records or information regarding life-threatening and communicable diseases will be confidentially maintained in the Human Resources Office in a secure area, apart from the employee's personnel file.

## **Drug and Alcohol Policy**

CGBGreen Bank is committed to maintaining a substance-free, healthful, and safe work environment. To promote this goal employees are required to report to work in appropriate mental and physical condition to perform their jobs in a satisfactory manner. Employees are forbidden to use, possess, consume, manufacture, distribute, purchase, sell, or be under the influence of alcohol, illegal drugs, or controlled substances during working hours, whether on the premises, or representing or conducting the business of CGBGreen Bank elsewhere. Reporting to work under the influence of alcohol or illegal drugs or being in possession of alcoholic beverages or illegal drugs on CGBGreen Bank's premises will not be tolerated. Such conduct is also prohibited during non-working time to the extent that, in CGBGreen Bank's opinion, it impairs an employee's ability to perform on the job or threatens the reputation or integrity of CGBGreen Bank.

The legal use of physician-prescribed, or legal over-the-counter drugs is permitted on the job if it does not impair an employee's ability to perform the essential functions of the job effectively and in a safe manner that does not endanger other employees or clients. Any employee taking any legal or prescribed drugs known to have possible side effects that affect or impair judgment, coordination, or other senses, or that might adversely affect the employee's ability to perform normal work in a safe and productive manner, must notify <u>theirhis or her</u> supervisor or other manager before commencing work. Information provided by the employee concerning the use of medication will be treated in a confidential manner. If <del>CGBGreen Bank</del> has reasonable cause to believe an employee is adversely affected by the use of a drug or medication such that a threat is posed to the safety of the employee, other persons, or to property, the employee may be denied permission to continue working pending further investigation. The investigation will be conducted expeditiously, with the resulting information treated confidentially to the extent possible.

An employee whose job performance has deteriorated through the use of alcohol and/or drugs to the extent that termination of employment is being considered may opt to enter an approved treatment facility of their choice. Upon successful completion of treatment, the employee may be permitted to resume normal employment.

Employees must give notification in writing to Human Resources within five (5) calendar days of any drug conviction for violation of a criminal drug statute if the violation occurred in the workplace. Employees who have substance abuse problems are encouraged to participate in a rehabilitation program prior to any disciplinary action. If an employee chooses not to undergo rehabilitation, CGBGreen Bank will take disciplinary action consistent with state law and regulation within 30 calendar days of receiving notice of the conviction. A conviction means a finding of guilt including a plea of nolo contendere, or the imposition of a sentence by a judge or jury in any federal or state court.

Violations of any part of this policy may lead to disciplinary action, up to and including immediate termination of employment. Such violations may also have legal consequences.

# **Smoking Policy**

The health and well-being of staff and visitors to CGBGreen Bank are primary concerns of management. The Environmental Protection Agency has released a report officially concluding that secondhand smoke is a Class A human carcinogen. It is also known that secondhand smoke causes respiratory illness and is suspected to be even more dangerous in its link with heart problems.

In order to protect the health of those who use our building, smoking or other use of tobacco products is prohibited in any offices or work areas within CGBGreen Bank. Smoking is permitted only out-of-doors.

# **Emergency Procedures**

Emergencies can occur at any time, and we need to be prepared to handle such situations to minimize injury and damage. The following information is designed to assist you in preparing for and handling an emergency.

## **Emergency Phone Numbers**

Hartford Police	<b>911</b> or <b>860-757-4000</b> (Routine calls)
Hartford Fire	<b>911</b> or <b>860-757-4500</b> (Routine calls)
Stamford Police	<b>911</b> or 203-977-4444
Stamford Fire/Ambulance	<b>911</b>
Health Emergencies	<b>911</b> (this alerts CT Green Bank first responders to a Teams call being made to 911)

# **Medical Emergency Procedures for Staff**

When dialing 911, CGBGreen Bank first responders are alerted that you have placed a call to 911. A paging system is no longer available since moving phones to Teams. TEAMS First Responders Notification Group is <u>FirstReponders@Ctgreenbank.com</u>.

# If the person is unconscious, not responsive, seriously injured or in apparent serious distress, immediately dial 911.

(This will always be a personal judgment call and do not worry about calling unnecessarily.) Please use the **Teams phone (not cell)** if possible as this triggers an in-house and police alert, and also sends message to CGBGreen Bank first responders.

# **First Responders Team Actions**

<u>Always know that if YOU are in distress and call 911 the first responders are also notified that</u> you are calling 911. Do not hesitate to use this in an emergency.

1. Response Team Members will go directly to code red location immediately. Follow trained response.

 In route to location, pick-up AED unit --portable First Aid Kit --notebook and Emergency Bag.
 Hartford Office Location: Wall mount outside of Greta Thunberg Huddle Room before hallway to Café.

Stamford Office Location: Wall mount in kitchen.

 If 911 has not yet been called, <u>CGBGreen Bank</u> trained staff will decide whether or not to call **911** directly or ask someone to do so and report the nature of the emergency and location. (Best to call in the presence of the victim if at all possible so information can be relayed to EMTs.)

One or two Response Team members will assess the situation and take the lead in providing necessary response. Remaining team members will provide the following:

- 1. Set-up AED for use, if needed.
- 2. Prepare for CPR relief, if needed. 3 to 5 minutes is desired.
- 3. Provide Privacy/Crowd Control, request non-response team personnel to evacuate the area until all is clear.
- 4. Meet and direct medical personnel to emergency location.
- 5. Once the Emergency Medical Team (EMT) has arrived the duties and responsibilities are transferred to them. They may take AED with them.
- 6. Provide necessary information and any other support needed by the EMT.
- 7. Contact necessary family member(s) of victim. (List at AED location)
- 8. See that victim is accompanied to ER when applicable.
- 9. Provide follow-up report to Human Resources Designee.

## Medical Emergency Procedure for all Personnel

Response team members will go directly to red code location and follow trained response instructions. If possible while in route to location, pick-up AED unit and portable First Aid Kit located inside the AED unit box mounted on the main hallway wall outside of the Greta Thunberg Room in Hartford, or kitchen in Stamford.

- 1. Response team evaluates situation and does one or all of the following:
  - a. Call 911
  - b. Team will activate procedure for 911.
- 2. Keep lines open for further communication.

A list of all family emergency numbers for staff is available and found inside of each office's defibrillator cabinet.

# Fire

In order to minimize property damage and possible loss of life, familiarize yourself with the building's fire prevention system. Know the location of fire alarm pull stations and fire extinguishers and familiarize yourself with the instructions on the extinguishers. Signs are posted throughout both offices for exits and outside meeting locations where staff need to gather.

## WHEN THE FIRE ALARM IS HEARD:

- EVERYONE SHOULD IMMEDIATELY STOP WHAT THEY ARE DOING.
- EVACUATE THE BUILDING IN A CALM, ORDERLY MANNER TO A CENTRAL LOCATION AT LEAST 300 FEET FROM THE BUILDING.
- Do Not Stop to Gather Belongings.
- Follow Emergency Exit Signs to Exit Building.
- Sweepers will sweep the office in their assigned areas, including common areas and bathrooms. Check offices and cubicles as you leave your area.
- Sign-in iPad should be picked up and taken to company gathering place.
- ALL DEPARTMENTS AND TENANTS: Hartford Office—gather in the Capewell Lofts parking lot area directly opposite the CGBGreen Bank reserved parking spaces. Stamford Office—gather along canal closer to parking garage.
- IF FRONT EXIT IS BLOCKED AND YOU MUST EXIT FROM THE REAR OF THE BUILDING, TRAVEL AROUND THE BUILDING AND HEAD TO THAT AREA. PLEASE REMAIN IN A GROUP. FIRE MARSHALL NEEDS HEAD COUNT IMMEDIATELY.
- DEPARTMENT SUPERVISORS TAKE A HEAD COUNT WHEN ALL CLEAR SIGNAL RECEIVED FROM FIRE MARSHALL SUPERVISORS WILL GIVE INSTRUCTIONS TO REENTER BUILDING.

Note: When moving into exit areas in an emergency situation, before going through the door, put your hand against it to feel for heat—there could be a fire on the other side. If the door feels cool proceed with caution. If the door feels hot, use an alternate escape route.

# **Fire Procedures**

If you should spot a fire, follow these suggested guidelines:

- 1. If the fire is minor (wastebasket, ashtray, etc.) extinguish if possible. However, do not take risks! Your personal safety comes first!
- 2. If the fire cannot be immediately brought under control without personal risk, isolate or contain if possible by closing the door to the fire area.
- 3. Call the Fire Department at 911
  - a. Give building name: CGBGreen Bank at Atlantic Works, or 700 Canal Street, 5<sup>th</sup> Floor.
  - b. Give building address and intersection: **75 Charter Oak Avenue, Suite 1-103,** Hartford, or **700 Canal Street**, **5**<sup>th</sup> Floor, Stamford
  - c. Give CGBGreen Bank telephone number (860) 563-0015.
  - d. Give location and extent of fire.
- 4. Pull the fire alarm pull station so that evacuation can begin.
- 5. If trapped by flame or heat:
  - a. If possible, telephone the Fire department and request immediate assistance.
  - b. Close doors separating you from the source of heat or flame.
  - c. Break glass window if necessary in order to escape.

d. Remember that both **heat and smoke rise**—air near the floor will be cleaner and cooler. Crouch down or crawl to exits.

# **Fire Drills**

Fire drills are conducted once a year according to town codes. The Fire department and property owners will be directly involved so that they can test the fire alarm system and see if fire evacuation procedures are being followed.

Supervisors will be designated as the fire safety captains for their area.

# **Fire Safety Captains**

There is a Fire Safety Captain and will help coordinate evacuation efforts. The captains' responsibilities include:

- 1. An awareness of employees in their area/office who are present that day so that all are accounted for after evacuating.
- 2. Knowledge of any employees with handicaps or disabilities which should be considered in an emergency.
- 3. Awareness of an up-to-date evacuation route from their area or office.
- 4. Checking of restrooms, conference rooms, smoking rooms or other areas which are not immediately visible to ensure that they are also evacuated.
- 5. Reporting any problems or special circumstances to Fire Warden.
- 6. Ensuring that people are exiting from the building in a calm and orderly fashion.

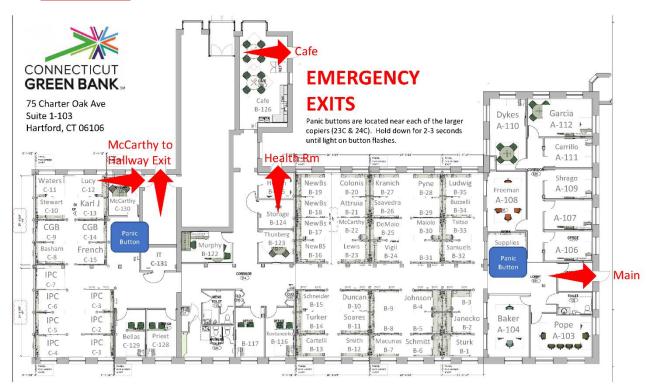
#### IN THE EVENT OF AN EMERGENCY, THE FIRE SAFETY CAPTAIN WILL IMMEDIATELY NOTIFY CGBGREEN BANK'S -'s PRESIDENT AND CEO, VICE PRESIDENT OF CHIEF OPERATING OFFICER AND/OR SENIOR MANAGEMENT TEAM.

## Housekeeping

Please inspect your space regularly and remove any items that could start or contribute to a fire or be a safety hazard. The following guidelines should be adhered to:

- 1. Do not allow accumulation of trash or waste material that is flammable.
- 2. Flammable materials or chemicals should not be stored within five feet of exit doors.
- 3. The wall and ceiling space around emergency and exit light fixtures should be kept clear.
- 4. The area surrounding electrical equipment should be free of clutter to provide for adequate air circulation.
- 5. Coffee makers and oven units are potential sources of fire. The last person leaving the building should check to be sure that they are turned off.

## **CGB**Green Bank Fire Exits

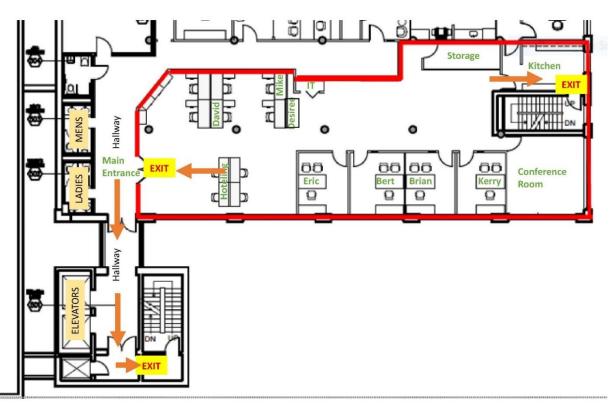


700 Canal – 5th Floor Stamford, CT 06902

**FIRE EXITS** 







# How To Handle Biological Agent Threats

At times facilities in communities around the country have received anthrax threat letters. Most were empty envelopes; some have contained powdery substances. The purpose of these guidelines is to recommend procedures for handling such incidents.

How to handle a suspicious letter or package marked with threatening message such as "anthrax":

- 1. Do not shake or empty the contents of any suspicious envelope or package.
- 2. **PLACE** the envelope or package in a plastic bag or some other type of container to prevent leakage of contents. Plastic bags and/or containers are available in the kitchen.
- 3. If you do not have a container, then **COVER** the envelope or package with anything (e.g., clothing, paper, trashcan, etc.) and do not remove this cover.
- 4. **LEAVE** the room and **CLOSE** the door, or section off the area to prevent others from entering. Keep others away.
- 5. WASH your hands with soap and water to prevent spreading any powder to your face.
- 6. If item has leaked: DO NOT try to CLEAN Up the powder. REMOVE contaminated clothing as soon as possible and place in a plastic bag, or some other container that can be sealed. This clothing bag should be given to the emergency responders for proper handling. Plastic bags and/or containers are available in the kitchen. SHOWER with soap and water as soon as possible. DO NOT USE BLEACH OR OTHER DISINFECTANT ON YOUR SKIN.
- 7. Contact **Human Resources.** They will take the necessary steps to report the incident to the proper authorities.
- 8. **LIST** all persons who were in the room or area when this suspicious letter or package was recognized. This list will be given to both the local public health authorities and law enforcement officials for follow-up investigations and advice.

# **Bomb Threats**

In the event of a bomb threat, evacuating people from the potential danger area is the highest priority. In the event of the receipt of a bomb threat, try to remember as many of the following details as possible:

- 1. Time call received
- 2. Time call terminated
- 3. Exact words of caller
- 4. Time to explode
- 5. Location of bomb (if given)
- 6. Description/type of bomb (if given)
- 7. Why was it placed?
- 8. Description of voice (male, female, deep, high, accents, etc.)
- 9. Background sounds (traffic, machinery, music, voices, etc.)

Then immediately call: 911 for the Police and Fire Department.

Immediately call **Administrative Services ext. 391 IT ext. 365**. Explosives can be concealed in any type of container and in any location. Any suspicious item must not be touched and should be considered dangerous. Alert police of anything out of the ordinary, and do not turn on or adjust anything electrical in nature (i.e. - thermostats, light switches, radios, etc.)

#### It is policy that everyone evacuates the building immediately!

# **COVID-19 Response**

The Green Bank recognizes its role in protecting its employees and in limiting the transmission of COVID 19. The organization has a taskforce that coordinates the organization's response. The Green Bank will adhere to appropriate regulations and orders and will work with employees to make sure that our work continues. The organization will implement the state's guidelines and reserves the right to limit the number of staff in the office at a particular time, require personal protective equipment be worn, require disclosure of exposure, require testing and/or vaccination, and other measures to be defined. Exceptions to policy must be approved by the Managing-Vice President Director of Operations and the President and CEO.

# **COVID-19 (and other pandemic) Guidelines**

- Masking—dependent upon the prevalence of the coronavirus in our community as well as local and state mandates, we may recommend or require that employees mask while present in our offices. Employees are always welcome to mask while indoors as they feel comfortable.
- When possible, social distance and keep away from your colleagues if at all possible.
- Employees with offices do not have to mask while in their own space. However, we don't have enough information to determine if the walls of the cubes are effective partitions. Employee masking at workspaces is a personal decision, based on personal judgement and comfort level.
- Visitors may be banned from entering our premises unless their physical presence is required by business needs. Please be cautious about hosting visitors in our offices and note that all visitors must be masked while in our offices.

# In Case of Emergency: Questions and Answers for Employees

## What happens if I can't reenter the building?

The Emergency Operations Team, including the President when available, will assess the immediate damage and will inform the President or designee of what to expect. You may be asked to assemble at a nearby building for further instruction.

## How will I know when and where to go back to work?

CGBGreen Bank has designated a Team Leader () for implementing its Business Continuation Plan. This team leader will contact you at home and let you know when and where to return for work. If the business disruption is a serious one, it may take up to 30 days for all staff to return. A small number of employees who handle critical business functions may be asked to report to work immediately in a different office location.

#### What should I do if a reporter approaches me?

If a member of the press approaches you, please refrain from commenting about the incident or your personal reaction to what has occurred. It is natural that any business – disrupting incident may result in press coverage, and the Marketing Staff is the designated CGBGreen Bank representative to keep the news media informed and answer questions. Please refer any such inquiries to that designee.



75 Charter Oak Avenue, Suite 1 - 103, Hartford, CT 06106 T 860.563.0015 ctgreenbank.com

# Memo

- **To:** Audit, Compliance, & Governance Committee of the Connecticut Green Bank Board of Directors
- From: Eric Shrago (Vice President, Operations) and Joe Buonannata (Senior Manager, Operations)
- Date: May 10, 2023
- **Re:** Proposed Update to Employee Handbook

As part of our ongoing governance review efforts, the Connecticut Green Bank ("Green Bank") staff regularly review and revise our Employee Handbook to reflect updated policies and circumstances. The most recent changes to the Employee Handbook were approved by the Audit, Compliance, & Governance Committee in October 2021.

As part of this latest revision, we are proposing the following changes:

- Wording:
  - Replacing all references to "CGB" with "Green Bank" to align with the Green Bank's brand guidelines;
  - Replacing all references to "he or she" or "he/she" with "they" or "their" to align with the Green Bank's commitment to BeREADI (belonging, racial equity, access, diversity, and inclusion); and
  - Replacing all references to "President" with "President and CEO" to reflect the accurate position title.
- Policies and Procedures:
  - Clarifying that expense reporting and requests for time off are now automated through SharePoint;
  - Adding Juneteenth to the list of company holidays as per Public Act 22-128<sup>1</sup>;
  - Amending the Educational Assistance Policy to remove the cost per credit hour limit while maintaining the overall maximum of \$10,000 per employee per calendar year;

<sup>&</sup>lt;sup>1</sup> <u>https://www.cga.ct.gov/2022/act/pa/pdf/2022PA-00128-R00SB-00350-PA.pdf</u>

- o Adding an employee benefit for gym membership; and
- Clarifying that upon an employee's departure from the Green Bank, Green Bank management and its IT consultants may remotely terminate mobile access and associated data. The Green Bank may also restore the device back to its factory settings.

Upon review and approval by the Audit, Compliance, & Governance Committee, these edits will be presented to the full Board of Directors for their review, consideration, and approval.

#### **RESOLUTION:**

**WHEREAS**, pursuant to Section 5.2.1 of the Connecticut Green Bank (Green Bank) Bylaws, the Audit, Compliance, & Governance Committee is charged with the review and approval of, and in its discretion recommendations to the Board of Directors (Board) regarding, all governance and administrative matters affecting the Green Bank, including but not limited to the Green Bank Employee Handbook;

#### NOW, therefore be it:

**RESOLVED**, that the Audit, Compliance & Governance Committee hereby recommends that the Board of the Green Bank approve of the revisions to the Green Bank Employee Handbook presented on May 16, 2023.

File #	Bill #	Committee of Origin	Link to File Copy	Bill Name
184/752	6688	Banking	https://cga.ct.gov/2023/fc/pdf/2023HB-06688-R000184-FC.PDF	AAC MORTGAGES, THE RESIDENTIAL HEATING EQUIPMENT FINANCING PROGRAM, THE CONNECTICUT HOUSING FINANCE AUTHORITY AND MOBILE MANUFACTURED HOMES.
191	6853	E&T	https://cga.ct.gov/2023/fc/pdf/2023HB-06853-R000191-FC.pdf	AAC FUNDING FOR MICROGRIDS AND RESILIENCE PROJECTS.
240	961	Environment	https://cga.ct.gov/2023/fc/pdf/2023SB-00961-R000240-FC.PDF	AAC CARBON-FREE SCHOOL REQUIREMENTS FOR NEW SCHOOL CONSTRUCTION AND ESTABLISHING OTHER SCHOOL CONSTRUCTION AND PUBLIC HEALTH REQUIREMENTS FOR SCHOOL DISTRICTS.
315	6764	E&T	https://cga.ct.gov/2023/fc/pdf/2023HB-06764-R000315-FC.PDF	AAC A SOLAR UNIFORM CAPACITY TAX AND MODIFICATIONS TO THE STATE'S RENEWABLE ENERGY PROGRAMS.
335	6851	E&T	https://cga.ct.gov/2023/fc/pdf/2023HB-06851-R000335-FC.pdf	AN ACT IMPLEMENTING RECOMMENDATIONS OF THE HYDROGEN TASK FORCE.
410	6805	P&D	https://cga.ct.gov/2023/fc/pdf/2023HB-06805-R000410-FC.PDF	AAC SOLAR INSTALLATIONS IN CONDOMINIUMS AND COOPERATIVES.
580	6664	Environment	https://cga.ct.gov/2023/fc/pdf/2023HB-06664-R000580-FC.pdf	AAC MANAGING WASTE AND CREATING A WASTE AUTHORITY.



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