



EMPLOYEE HANDBOOK

This Handbook is not a contract. Employment with the Aspen Institute is on an "at will" basis, and both the Aspen Institute and any employee may end the employment relationship at any time and for any reason.

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INTRODUCTION

This Employee Handbook has been prepared as a reference for the personnel of the Aspen Institute, Inc. ("the Institute"). It contains information that the Institute's staff may find useful in their daily activities. This Handbook discusses how the Aspen Institute functions on a day-to-day basis, from its office hours to its guidelines regarding traveling for the Aspen Institute on business. However, please do not consider this Handbook your only source of information about the Aspen Institute's policies and procedures. If you have any questions please ask your supervisor or Human Resources.

HISTORY

The Aspen Institute, founded in 1949, is an international nonprofit organization dedicated to fostering enlightened leadership and open-minded dialogue. Through seminars, policy programs, conferences and leadership development initiatives, the Institute and its international partners seek to promote nonpartisan inquiry and an appreciation for timeless values. The Institute is headquartered in Washington, DC and has campuses in Aspen, Colorado, and on the Wye River on Maryland's Eastern Shore. It also maintains offices in New York City and has an international network of partners.

PURPOSE OF THIS HANDBOOK

This Employee Handbook is not a contract and is not intended to be considered terms of employment. This Handbook does not alter the "at will" relationship between the Aspen Institute and the employee, nor does it guarantee employment for any definite period of time.

This Handbook is intended to give employees information about the Institute's policies. The Aspen Institute reserves the right to revise this Handbook at any time. The Human Resources department will be responsible for revisions, and will inform Institute employees when revisions are made. This Handbook supersedes any previous handbooks or unwritten policies.

The Aspen Institute retains the right to delete, add to and amend any information, statements, employee benefits, or terms and conditions of employment contained in this Handbook at its own discretion.

AT-WILL EMPLOYMENT

Employment with the Aspen Institute is on an “at will” basis. This means that any employee or the Aspen Institute may end the employment relationship at any time and for any reason. Verbal promises of employment, promises relating to employment, or promises of employment for a specific term or under specific conditions, are not permitted or honored.

CHAPTER 2: COMPANY POLICIES

A. POLICY OF EQUAL EMPLOYMENT OPPORTUNITY

Prohibition of Discrimination or Harassment

The Aspen Institute prohibits any discrimination or harassment based on a person's

race, color, gender, national origin, age, disability, religion, sexual orientation, or any other ground prohibited by federal, District of Columbia, state, or local law ("protected status"). This policy covers all aspects of employment, including hiring, training, promotions, termination, pay, and the work environment.

Prohibition of Offensive Behavior & Remarks

The Aspen Institute is committed to providing a work environment free from offensive behavior or statements directed at a person's race, gender, or any other protected status. Employees may not make such comments or engage in such behavior in the presence of other employees or any other person. This policy prohibits such offensive behavior or statements in the workplace, while representing the Aspen Institute, or during travel or overnight stays paid for by the Aspen Institute. The policy prohibits comments that are derogatory toward any person because of race, gender, or any other protected status **even if no one present is offended by the comments.**

The types of prohibited behavior include acts or remarks that an employee knows or should know to be offensive, including but not limited to the following:

1. Any offensive or demeaning comment, remark, or epithet referring to race, gender, or other protected status, including that which is intended as humor;
2. Any offensive or demeaning gesture or other behavior directed toward another person because of that person's race, gender, or other protected status;
3. Use of the Aspen Institute's property to display or store material that is demeaning or offensive on the basis of race, gender, or other protected status, including but not limited to nude or suggestive photographs;

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4. Sharing or displaying any item or material that is demeaning or offensive on the basis of race, gender, or other protected status;

Consistent with the Aspen Institute's mission to advance a free, just, and equitable society, the Aspen Institute is committed to creating a safe and vibrant community that

is respectful, inclusive, and welcoming to people from all different backgrounds and across the world. The Aspen Institute recognizes that employees will have different viewpoints, opinions, perspectives, and convictions, often leading to dynamic discussions. This Policy is not intended to preclude such discussions. However, the Aspen Institute does expect employees to treat each other with mutual respect and dignity, which allow us to come together to share a free and open exchange of ideas.

Aspen also strives to provide a work environment for our employees free from offensive behavior or statements directed at a person's race, gender, or any other protected status at our workplace and events, including comments and statements by visitors or other non-Aspen employees, who are subject to the Aspen Institute's "Community Agreement."

Prohibition of Sexual Harassment and Similar Behavior

The Aspen Institute prohibits unwelcome sexual advances, requests for sexual favors, and other verbal or physical behavior of a sexual nature when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance, or creating an intimidating, hostile, or offensive work environment.

This prohibition of sexual harassment extends to conduct or statements directed toward employees, vendors and contractors, donors, event attendees, business guests, visitors, fellows, trustees, advisory council and working group members, and others that employees may come in contact with while working, representing the Aspen Institute or during travel or overnight stays paid for by the Aspen Institute.

Aspen also strives to provide a work environment for our employees free from sexual harassment by visitors or other non-Aspen employees.

For more information, again refer to the Aspen Institute's "[Community](#)

[Agreement](#),” which applies to other stakeholders in the Aspen Institute community. (Parallel expectations for employees are incorporated into this Handbook below.)

Discipline for Violations

All violations of the Aspen Institute’s policies against discrimination, harassment, and offensive behavior will result in appropriate discipline to stop the misconduct and deter future misconduct, including discipline up to and including termination.

Reporting Violations and Questions

Employees must report all violations and suspected violations of our anti discrimination and harassment policy that they experience or witness and are asked to do so right away to ensure a safe workplace for all and timely investigation of violations. Employees who believe that they have been subjected to inappropriate comments or behavior by a non-employee while working for the Aspen Institute must also report this matter.

The Aspen Institute recognizes that there are times when a person who witnesses or experiences unlawful discrimination or harassment may realize only in retrospect that a line was crossed and therefore may sometimes need more time before being able to speak about it. In such cases, the Aspen Institute asks that employees report their concerns as soon as possible and explain the reasons for any delay in reporting. The Aspen Institute will investigate all such complaints promptly and thoroughly as soon as the employee brings the complaint to the Aspen Institute’s attention.

The Institute offers several channels to raise concerns or complaints. Actual or alleged violations of this policy of equal employment opportunity should be reported to through any of the following channels:

- You can submit a report to the Aspen Institute’s reporting website operated by an independent third-party service (Employee Confidential) that helps with intake and routing:
 - Online: <https://EmployeeConfidential.com/Report/aspen>

- Directly to HR by contacting the Vice President of People and Culture and/or the Director of People & Strategic Operations;

- If the concern or complaint involves HR, you may direct your inquiry to Legal by contacting the General Counsel, and/or Deputy General Counsel.

Because the Aspen Institute wants to make sure it timely follows up on all such complaints, reporting to your manager or supervisor does not meet the requirements of this policy. A report of harassment or discrimination to anyone other than the individuals listed in this policy is not sufficient and employees must report to one of the options noted above. Refer further below for information about reviewing and investigating reports.

Reports to Government Agencies

In addition to reporting internal complaints of discrimination or harassment, you have the right to file a complaint with the federal Equal Employment Opportunity Commission or a local employment rights agency. Please contact the Vice President of People and Culture or review the EEO posters to obtain contact information for these agencies.

Investigation of Harassment or Discrimination Complaints

The Aspen Institute will undertake an appropriate investigation of all complaints of violation of our policies against discrimination, harassment, and offensive behavior. It is the responsibility of every employee to cooperate fully with any investigation.

The Aspen Institute will keep complaints confidential to the extent possible under the circumstances. However, absolute confidentiality is inconsistent with a thorough and fair investigation. Therefore, any complaint that is filed will be kept confidential to the extent consistent with a fair and thorough investigation.

Through the Aspen Institute reporting hotline, employees have the option of making anonymous reports and of discussing their concerns anonymously. However, the

Aspen Institute strongly encourages reporters to identify themselves and give as many details as possible, since anonymous reports may greatly limit our ability to fully investigate and address a matter and may be unfair to the person about whom the complaint is made. The Aspen Institute may well be unable to conduct any investigation into anonymous complaints that are based upon rumors or lack concrete details. The Aspen Institute may take any appropriate action in response to violations, up to and including termination.

Prohibition of Retaliation

The Aspen Institute has a strict policy of no unlawful retaliation against any employee for making a good faith report of alleged violations of our policy against unlawful discrimination, harassment, or offensive behavior or comments or for participating in an internal or government investigation of possible discrimination. Reports of potential retaliation must be reported to HR immediately so that HR may review any such concerns. Any employee who engages in prohibited retaliation will receive appropriate discipline, up to and including termination.

Pregnancy & Childbirth

In accordance with federal, District of Columbia, and applicable state law, the Institute treats women affected by pregnancy, childbirth or related medical conditions at least as well as other employees with temporary medical conditions.

Reasonable Accommodation

In accordance with applicable law, the Aspen Institute will make reasonable accommodations for persons with statutorily protected disabilities and for pregnancy and pregnancy-related conditions when this will permit the person to perform the essential functions of the job and does not impose an undue hardship. The Aspen Institute will also make reasonable accommodation for the religious needs of employees where such accommodation can be made without undue hardship, as required by law. If employees are interested in requesting an accommodation, they should reach out to HR for more information.

B. WHISTLEBLOWER POLICY

A whistleblower, as defined by this policy, is an employee of the Aspen Institute who reports an activity, which he/she reasonably believes in good faith to be illegal or fraudulent, to one or more of the parties specified in this Policy.

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The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

For purposes of this policy, examples of illegal or fraudulent activities are violations of federal, state or local laws and regulations; billing for services not performed or for goods not delivered; fraudulent financial reporting; and violations of health and

safety laws and regulations.

If an employee has knowledge or a concern of activity reportable under this policy, the employee must contact one of the following channels:

- Submit a report to the Aspen Institute's reporting hotline operated by an independent third-party service (Red Flag Reporting) that helps with intake and routing:
 - Online: www.RedFlagReporting.com/AspenInstitute
 - Phone: 1 (888) 630-9401
 - Fax, e-mail, or regular mail (provide the Aspen Institute's name):
 - Fax to 1-330-572-8146
 - Email to redflag@redflagreporting.com
 - Mail to RFR, P.O. Box 4230, Akron, Ohio 44321.
- Directly to the Chief Financial Officer, General Counsel, and/or Vice President of Operational Effectiveness & Enterprise Risk Management or;
- Alternatively, directly to the Chair of the Aspen Institute Board of Trustees Audit & Risk Committee @ 202-942-2801

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as consistent with an effective investigation, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to allow accused individuals a fair opportunity to defend themselves.

Through the Aspen Institute's reporting hotline, reporters have the option of making anonymous reports. However, the Aspen Institute strongly encourages reporters to identify themselves and give as many details as possible, since anonymous reports may greatly limit our ability to fully investigate and address a matter and may be unfair to the person about whom the complaint is made. The Aspen Institute may

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well be unable to conduct any investigation into anonymous complaints that are based upon rumors or lack concrete details.

The Aspen Institute will not retaliate against a whistleblower, as defined above. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, poor work assignments, or threats of physical harm. Any whistleblower who believes he/she is

being retaliated against must contact any one of the resources listed above immediately. An employee who retaliates against a whistleblower who has reported a violation in good faith is subject to discipline, up to and including termination of employment.

The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated, nor does it include protection for bad faith or unreasonable reports filed for malicious reasons. All reports of illegal and fraudulent activities will be promptly submitted to the Chief Financial Officer, General Counsel, Vice President of Operational Effectiveness & Enterprise Risk Management who are responsible for arranging for an investigation and coordinating any corrective action. Reports can be made to the President & CEO and/or Risk & Audit Chair if matter involves CFO, General Counsel and VP, Risk. Employees with any questions regarding this policy should contact Legal or Human Resources.

C. STANDARDS OF PERSONAL CONDUCT

Behavior of Employees

Certain rules regarding employee behavior are necessary for efficient business operations and for the benefit and safety of all employees. Conduct that interferes with operations, discredits the Aspen Institute, or is offensive to customers or co workers will not be tolerated.

The following are examples of misconduct that can result in disciplinary action ranging from verbal warning or counseling to immediate termination or referral to law enforcement, depending on the nature and severity of the violation:

- Refusing to obey the legitimate direct request of a supervisor.
 - Repeated tardiness or absenteeism, or failure to give timely notice of absences or tardiness.
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- Committing any criminal act that involves fraud, unethical behavior, theft, breach of trust, or other offense that would call trustworthiness into question.
 - Willfully damaging the Aspen Institute property or the property of other employees.
 - Harassment, abusive language, or threats of any kind directed against visitors, employees or supervisors.

- Abuse of the sick leave program or any other leave program.
- Providing unauthorized persons with confidential information concerning the Aspen Institute or its donors.
- Unsatisfactory work performance.
- The use of Institute telephones to make unauthorized long distance telephone calls or excessive personal telephone calls.
- Unauthorized use of Institute credit cards. [See updated "Credit Card, Travel, & Expense Reimbursement" policy [here](#).]
- Making false or malicious statements concerning the Aspen Institute or its employees.
- Violation of any Institute policy, such as its drug and alcohol policy and its policies prohibiting discrimination and harassment.
- Engaging in or threatening acts of workplace violence.
- Treating co-workers, supervisors, the Aspen Institute clients or vendors disrespectfully or in a discourteous manner.
- Falsifying or altering any Aspen Institute document such as employment applications, timesheets, expense accounts, etc.
- Misusing the Institute's communications systems, including electronic mail, computers, Internet access, and telephones.
- Sleeping on the job without authorization.
- Failure to report to management suspicious, unethical, or illegal conduct by co-workers, supervisors, or vendors.
- Failure to report to management any threatening or potentially violent behavior by co-workers.
- Making malicious or defamatory comments about any co-worker, supervisor, client, or vendor.

- Behavior or conduct that is offensive or otherwise contrary to the Aspen Institute's best interest.
- Violating any of the policies in this Handbook or any other written Aspen Institute policies or failing to follow any of the procedures in this Handbook. For more Aspen Institute policies, refer [here](#) on AspenNet.

The preceding list is not all-inclusive, but only illustrates some of the types of conduct that are unacceptable. There are other types of conduct for which disciplinary action, including immediate termination, is appropriate. The above list is not intended to restrict the Aspen Institute's legal right to terminate at-will for any lawful reason.

Professional Conduct and Business Etiquette

The Aspen Institute deals with many segments of the public, including members of the press and news media, the general public and Members of Congress and their staffs. The prestige, reputation and credibility of the Aspen Institute depend on the professional image presented by the Aspen Institute employees. For these reasons, all employees are expected to conduct themselves in a courteous and professional manner, and to maintain such ethical and moral standards in their business activities so as to avoid any injury to, or unfavorable reflection upon, the Aspen Institute or fellow employees. Of course, neither this policy nor any other policy in this Handbook is intended to or will be construed as infringing on employees' rights to take concerted activity under the National Labor Relations Act, including employees' discussions with one another about working conditions and wages.

Employees traveling on the Institute business are expected to maintain a high level of professionalism and to follow all the Aspen Institute's policies while on such travel.

Personal Dress and Organization

The appearance of an individual and their work area is an important part of our image. Appearance plays an important role in establishing credibility as well as conveying an appropriate, professional image. For this reason, employees are requested to keep their office or work area organized and in good order. While this may not always be possible, as a general rule neat and organized office or work area should be maintained. Employees are also expected to be well-groomed and dressed in a suitable manner. Excessively revealing, worn and dirty, torn, or excessively

casual attire should not be worn. Departments and supervisors may establish more specific dress codes, as needed.

D. CODE OF BUSINESS CONDUCT

Ethical Standards

The Aspen Institute is a not-for-profit, tax-exempt organization whose mission is to foster values-based leadership and to provide a neutral and balanced venue for discussing and acting on critical issues. The Aspen Institute's staff and the many people and organizations that support our work are entitled to expect that Aspen staff will act according to high ethical standards of integrity, candor, and honesty in communications and interactions with one another, our directors, supporters, other organizations, government officials, the press and media, and the public. In addition, the reputation and credibility of the Aspen Institute, and its ability to be successful in its mission, depend on the professional image and ethical behavior of our staff. For these and other reasons, all staff must observe high standards of personal and professional ethics. All staff must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations in all our work, including when traveling on Aspen business.

The willingness of each of us to raise ethical concerns is essential. Employees should get help from their manager or others here at the Aspen Institute whenever they are in doubt about the ethical course of action. No one will suffer any adverse effects to their job or career as a result of raising an ethical concern or questioning an Aspen Institute practice in good faith.

Ultimately, the responsibility for ethical behavior rests with each of us in the exercise of our independent judgment.

As you consider a particular situation, evaluating the following factors may help you arrive at a satisfactory answer:

- Is my action consistent with the Aspen Institute's written policies?
- Does my action give the appearance or perception of impropriety?
- Would the action bring discredit to an employee or the organization if disclosed?
- Can I defend my action to my supervisor, other employees, and to the general public?
- Does my action meet my personal code of behavior?

Remember to always use your good judgment and common sense.

Diversity

As a nonpartisan forum for values-based leadership and the exchange of ideas, the Aspen Institute is dedicated to operating in a manner that welcomes and supports

diversity and inclusion in all its forms. Diversity and inclusion involves recognizing and equally valuing the agency and perspectives of all people regardless of race, ethnicity, ability, class, religion, age, gender identity, or sexual orientation, or any other differentiating characteristic. By fostering a community of diverse voices, talents, and backgrounds, we are better able to enact meaningful change on the global stage and ensure that the opportunity for social and political impact is available to all.

To uphold these values, the Institute’s Board of Trustees, management, and staff work to promote pluralism and inclusion within the organization and its constituencies. Each person involved with the Institute’s mission has the opportunity to make an impact—regardless of gender, race, age, socioeconomic status, physical ability, or any other dimension of variation. In hiring, we seek out new and unique voices, and uphold a workplace environment of inclusivity. We recognize that in the analysis of issues and creation of solutions, it is vital to gain insight from the diverse array of perspectives of our stakeholders including staff, partners, and participants.

The value of diversity and inclusion is especially important in the work of our programs throughout the nation and world. Many of the Institute’s policy programs, seminars, and fellowships address these issues of diversity, equity and inclusion through the work they do and by engaging community relationships. Aspen programs allocate and leverage resources, including scholarships and continued engagement with underrepresented communities, to ensure broader representation and participation in our programming. We strongly believe these practices will lead to innovative solutions, new ideas, and more successful outcomes.

We are all responsible for fostering a society of open opportunity, where each person is aided by their capabilities and potential, and no one is disadvantaged by belonging to any particular group. At the Aspen Institute, we value the diverse perspectives of our employees, friends, participants, and the communities in which we work, and commit to doing what is necessary to ensure that diversity is a core value that underlies the fulfillment of our mission.

Dealing with Participants

The experience our participants have is the focal point of our work. We must work with

them to understand and anticipate their needs, and identify and remove obstacles they may see in doing business with us.

We need to respond promptly and courteously to all inquiries and requests. We should accurately represent our services in our marketing, advertising, and sales efforts.

We strive to provide programs of the highest quality. We need to understand what represents "highest quality" in the eyes of the consumer. We must regularly measure effectiveness and continuously improve our quality.

Dealing with Foreign Officials

[See updated "Partisan Political Activity, Lobbying, & Dealings with Government Officials" [here](#).]

Gifts, Meals, and Entertainment

Except when dealing with representatives of the federal, state, or local government, employees may receive or give customary business amenities, such as meals, provided they are associated with a business purpose, reasonable in cost, appropriate as to time and place and are such as not to influence or give the appearance of influencing the recipient. However, excessive business-related gifts and entertainment are inherently compromising and do not belong in our business relationships.

Employees may not give or receive gifts, meals or entertainment that:

- Influence or give the appearance of influencing the recipient and can be viewed as a bribe, kickback or payoff.
- Violate any law or generally accepted ethical standards.
- Cannot withstand public ethical review.
- Are in the form of money.
- Are gifts or favors of more than a nominal value.

Dealing with Employees of the Federal, State or Local Government

[See updated "Partisan Political Activity, Lobbying, & Dealings with Government Officials" policy [here](#).]

[See updated "Partisan Political Activity, Lobbying, & Dealings with Government Officials" policy [here](#).]

Political Contributions

[See updated "Partisan Political Activity, Lobbying, & Dealings with Government Officials" policy [here](#).]

Media Contact and Public Domain

Employees should take special care to avoid discussing confidential information about the organization with others either in informal conversation or at meetings. News media contact, responses and public discussion of internal business should be referred to the Executive Vice President and authorized spokespersons.

Conflict of Interest

The purpose of the Conflict of Interest and Conflict of Commitment Policy is to provide guidelines to protect the Aspen Institute and its mission.

A conflict of interest refers to a situation in which an employee must not have, or appear to have, a financial or other interest that is adverse to Aspen's interests. An employee's interests include for these purposes the interests of (a) immediate family members or (b) an organization in which he or she serves, or is negotiating in the future to serve, as an officer, employee, or agent.

A conflict of commitment refers to a situation in which an employee engages in an outside activity, either paid or unpaid, that interferes with their primary job responsibilities, or when an employee makes an unauthorized use of the Aspen Institute's resources for an external activity.

Employees must disclose any actual, potential, or apparent conflict of interest or conflict of commitment by completing a Disclosure of Outside Activities and Financial Interest form. This form must be submitted at least annually to HR, who in turn will discuss any potential conflicts with the Institute's General Counsel and/or the supervisor, as appropriate.

Where appropriate, the Aspen Institute may require suitable remedial action, such as divestiture of adverse interests, recusal from certain decisions, or other action to avoid an appearance or existence of a conflict.

Since it is impossible to describe all situations that may cause or give the appearance of a conflict of interest or conflict of commitment, the prohibitions included in this policy are not intended to be exhaustive:

- a) Employees may not engage in, directly or indirectly either on or off the job, any conduct that is disloyal, disruptive, competitive, or damaging to the Aspen Institute or its mission.
- b) Employees must disclose employment, either paid or unpaid, outside of the Aspen Institute that could create a conflict of commitment, or the appearance of a conflict of commitment.
- c) Employees must not use Aspen Institute resources for outside employment or volunteer activities. This includes buildings, staff (personnel), equipment, or technology to carry out any outside activity, unless it is approved in advance.
- d) Employees must disclose to the EVP of Administration and their EVP, any financial interest they have in any entity that engages in commercial transactions with the Aspen Institute.
- e) Employees must not use information received from participation in Aspen Institute, whether expressly denominated as confidential or not, for personal gain or to the Aspen Institute's detriment.
- f) Employees may not generally receive or solicit gifts or any special discounts or loans from any person or firm involved in commercial transactions with the Aspen Institute, with some limited exceptions, such as when the gift is worth \$50.00 or less. Requests for exceptions should be made to the VP of Finance, who will look for general guidance to the ethics rules applied to employees of U.S. administrative agencies.
- g) Employees may not engage in any lobbying activities (as defined in the Lobbying Disclosure Act) without full compliance with the Aspen Institute's updated "[Partisan Political Activity, Lobbying, & Dealings with Government Officials](#)" [policy here](#).
- h) Other than in the course of their duties for the Aspen Institute, employees may not represent or have business relationships with any person or organization that engages in activities that are significantly related to the employee's job duties for the Aspen Institute or to the program area in which the employee works, without advance written approval of their supervising Executive Vice President (after consultation with the Legal Department). Such approval will not routinely be granted and will only be granted in situations in which it is

feasible to give full notice of the business relationship to all third parties participating in programmatic activities in which the employee is involved and in which there is no actual or apparent conflict with the interests of the Aspen Institute.

You must disclose any potential conflict of interest or conflict of commitment to your manager so it can be resolved.

If you are not sure if your situation or relationship with another organization might conflict with your job performance or our interests, you should discuss it with your manager and EVP. Most potential conflict situations are readily resolved and it is always best for you to raise your concern.

If your manager asks you to do something that causes a conflict of interest, you should speak with the Vice President, Director or the EVP.

In addition, the President's approval is required before any Officer can accept a paid position of responsibility with an outside business organization. Arrangements for securing approval should be made through the General Counsel.

E. SMOKING POLICY

Smoking is prohibited in all work areas.

F. DRUG AND ALCOHOL POLICY

The Aspen Institute prohibits possessing, using, distributing, selling, transferring, or being under the influence of any illicit or illegal drugs, or possessing illegal drug paraphernalia, while on the Aspen Institute's premises or attending Institute events, while performing Aspen Institute business, or any time during the work day. (This includes use of marijuana even in locations where it is legal for private recreational use.)

The Institute generally prohibits consumption/use of alcohol during the workday or when performing Institute business. However, alcohol may be consumed at Institute events when the social custom and occasion are appropriate. Individuals still must be of legal drinking age and consumption must be moderate. In all cases, individuals who engage in the Institute's community must maintain good

judgement or the ability to act responsibly and consistent with Institute policies, including its Community Agreement (for employees).

G. ANTI-NEPOTISM POLICY (EMPLOYMENT OF RELATIVES)

Members of an employee's immediate family will be considered for employment on the basis of their qualifications. However, preferential treatment based on a family relationship or a romantic or sexual relationship is prohibited. It is our policy not to allow an employee to have direct or indirect decision-making influence upon employment, salary, or supervision of an immediate family member or a person with whom the employee has a romantic or sexual relationship.

If two employees marry, establish a romantic or sexual relationship, or become immediate family members, they may continue employment in their current positions as long as neither employee is the direct or indirect supervisor of the other.

For purposes of this policy, "immediate family" includes an employee's parents, grandparents, children, grandchildren, brothers, sisters, spouse (or ex-spouse), mother-in-law, father-in-law, brother-in-law, sister-in-law, son-in-law, daughter-in-law, stepchildren, stepmother, and stepfather. For purpose of this policy a "spouse" includes any person with whom an employee is cohabiting (or has cohabited) in a long-term sexual or romantic relationship, even if the two individuals are not legally married.

H. CONFIDENTIALITY POLICY

All non-public records and information relating to the Aspen Institute or its affiliates or participants are confidential, and employees must maintain this confidentiality. No non-public Aspen Institute or Aspen-related information, including without limitation, documents, notes, files, records, oral information, computer files or similar materials may be removed from the Aspen Institute's premises except in the ordinary course of performing duties on behalf of the Aspen Institute or with the Aspen Institute's permission. Additionally, the contents of Aspen's records or information otherwise obtained in the normal course of business may not be disclosed to anyone, except where required for a business purpose. Employees must not disclose any confidential information, purposefully or

inadvertently (through casual conversation), to any unauthorized person inside or outside the organization. Employees who are unsure about the confidential nature of specific information should ask their supervisor for clarification. Aspen Institute

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employees must promptly return all non-public information, including software, diskettes, intellectual property, copyrightable material, and other documents, books, notes, tapes, instruments and property of any kind (either tangible or intangible) that were made, compiled, obtained or acquired during their employment with the Aspen Institute, including originals and copies, whether confidential or not, upon the termination of employment, and agree not to retain any copies of any of such information.

I. EMPLOYEE HONORARIA

Employees who devote more than 50 percent of their employable time to Aspen Institute programs and receive benefits from the Institute are subject to this policy.

An employee may accept and retain an honorarium from another organization for work based on the employee's own professional expertise if the honorarium is not incurred primarily by reason of the employee's position with the Aspen Institute, and if the work in question does not conflict, or appear to conflict, with the employee's duties and employment at the Institute.

Where an honorarium is incurred primarily by reason of the employee's position with the Institute, the honorarium shall be donated to the Institute, and will be designated to the employee's area of interest in the Institute unless otherwise specified by the donor.

Honoraria that may raise the issue of conflict or apparent conflict with the employee's position at the Institute shall be disclosed to the manager overseeing the employee's area of activity. Where there is a conflict or apparent conflict under this policy, the employee should refuse the honorarium or may designate that the honorarium be paid to the Institute.

Any question concerning this policy should be referred to the Human Resources Department.

J. LAWFUL OFF-DUTY ACTIVITIES

The Institute complies with New York, Colorado, and California laws prohibiting

the termination of employees for lawful activities outside working hours and not on the Institute's premises. There are certain exceptions to these statutes. For example, termination for activities that create a conflict of interest is generally

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permitted. For further details about the provisions of this law, employees should consult the Human Resources Department.

K. EXTERNAL COMMUNICATIONS POLICY

[See updated "External Communications" policy [here](#).]

L. INFORMATION TECHNOLOGY SERVICES APPROPRIATE USE POLICY

[See updated "IT Acceptable Use of Technology" policy [here](#).]

M. WORKPLACE SAFETY

The Institute's first priority is the safety and security of people in our community, including employees. You should use care to avoid circumstances that cause accidents and you should report any possible hazards to your supervisor. If you have an accident – no matter how minor – while engaged in work activity you should report the accident to your supervisor.

Employees who disrupt the workflow by threatening other employees with physical harm or engaging in behavior such as harassment, intimidation, coercion or reprisal are subject to immediate termination for cause.

The Aspen Institute has a no-weapons policy for all our locations, events, meetings, and convenings, wherever they occur. This is irrespective of whether an individual has a concealed weapons permit, or whether the location permits carrying weapons. The only exception is for law enforcement or security the Institute has engaged or allowed at its convenings, but only as part of their official role.

N. TELECOMMUTING AND REMOTE EMPLOYEE GUIDELINES

Telecommuting can refer to informally working from home sporadically, or to a formal arrangement whereby an employee's base office is in their home, or any location other than one of Aspen's main office locations ("Remote Employee").

Not all employees are permitted to telecommute or work remotely, and the Institute does not confer this right upon any employee; it is not an entitlement and is not a company-wide benefit. The decision to allow telecommuting depends on various factors including, but not limited to: the nature of the employee's job, the demands

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and dynamic of the team/department, the employee's tenure and performance history. Telecommuting/remote work arrangements in no way change the terms and conditions of employment with the Aspen Institute.

All requests to telecommute, whether a formal remote work arrangement or "working from home for a day" must be approved in advance by the supervisor. Remote Employee arrangements should also be approved in advance by the EVP. Approval of the request in one instance does not imply that the employee has the right to continue telecommuting or working remotely.

A Remote Employee Work Agreement may be terminated at any time at the discretion of the supervisor or the Institute. Although efforts will be made to provide reasonable (at least 30 days) notice of such a change to accommodate personal commitments, such as childcare and commuting requirements, there may be instances when such notice is not possible. An employee may also discontinue participation in a remote work arrangement upon reasonable notice to the Institute.

Effective March 2021, the Institute's interim policy on Remote Teleworking can be found [here](#). This policy is in effect until at least March 2022.

CHAPTER 3: COMPENSATION AND PERFORMANCE REVIEWS

A. EMPLOYEE CLASSIFICATION

Listed below are the classifications of employees:

Regular Full-Time

An employee who is scheduled to work at least 30 hours per week, every week (year round), is classified as regular full-time.

Regular Part-Time

An employee who is scheduled to work 29 or less hours per week, every week (year round), is classified as regular part-time.

Temporary Employee-An employee who (a) who works intermittently during the year and does not work year round, or (b) is hired to fill a position of limited

duration (no more than 364 days) is classified as temporary.

Intern- A temporary employee, usually a student enrolled in an undergraduate or graduate college program, typically coinciding with a college semester. Interns typically work less than 30 hours per week or are hired as a seasonal employee.

B. PAYROLL

The Accounting department oversees the payroll process. Payroll is processed bi weekly. The Human Resources and Accounting departments work together to ensure that all employees are compensated accurately and promptly. Non-exempt or hourly employees must submit bi-weekly timesheets, approved by the employee's supervisor.

C. EMPLOYEE COMPENSATION

Employees are paid bi-weekly. Should pay day fall on a holiday, checks and vouchers will be dated the business day before. Payroll checks are mailed to the employee's home address unless alternate arrangements have been made. The Institute provides a half-hour paid lunch period for all non-exempt regular employees who work at least six (6) consecutive hours in a day.

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D. CORRECTION OF INADVERTENT PAYROLL ERRORS

We are committed to paying employees correctly and accurately. Our policy is to prohibit improper deductions from your paycheck. However, from time to time we may inadvertently deduct pay inappropriately or fail to pay overtime when due. In particular, our policy prohibits any deductions from the salaries of exempt employees that are not permitted by 29 C.F.R. § 541/602(a); if an exempt employee is ready, willing and able to work, deductions will not be made for times when work is not available during the week. If you believe improper deductions have been made or appropriate overtime has not been paid, please contact our Payroll Administrator. We are committed to reimbursing employees if there have been improper deductions or failure to pay overtime and any errors will be promptly corrected.

E. DIRECT DEPOSIT

The Institute encourages its employees to utilize direct deposit, a service that ensures all or part of an employee's paycheck is automatically deposited in the bank(s) of their choice. Employees may enroll in Direct Deposit through the Self

Service Portal in Paylocity, our HR/Payroll Database. An employee may choose to have their entire pay or a portion of their pay deposited directly into multiple checking and savings accounts. Employees who use direct deposit may view copies of their checks in Paylocity.

To enroll in direct deposit, an employee must enter their banking information into the Paylocity self-service portal. Employees participating in direct deposit should notify the human resources department immediately of any changes with their banking institutions or accounts.

F. OVERTIME COMPENSATION

All employees are classified either as "exempt" or "non-exempt" as determined by HR. These terms are used to identify who is eligible to receive overtime compensation. The terms derive from the federal law that, among other things, establishes overtime payment requirements. This law is known as the Fair Labor Standards Act (FLSA).

Company employees in executive, administrative or professional positions are not covered by the overtime provisions of the FLSA, and therefore are classified as

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"exempt employees." In general, exempt employees are not entitled to special overtime compensation.

Other employees, such as those in support positions, are covered by the overtime provisions of the FLSA, and therefore are classified as "non-exempt employees." Non-exempt employees who work over 40 hours in a work week will be paid time and a half for the hours in excess of 40 or for any work over 8 hours per day in applicable states. Non-exempt employees who work on company recognized holidays will be paid their regular rate for the extra hours worked in addition to their regular holiday pay. Employees must obtain advance approval from their supervisor before working overtime.

G. TRAVEL PAY FOR NONEXEMPT STAFF

Non-exempt employees traveling out of town overnight will be paid for actual hours worked, but will not be paid for travel time outside of normal work hours. If the non-exempt staff member is a passenger (on a plane or other means of transportation), he/she will only be paid for those hours that were traveled within

the regular workday (unless work is performed while traveling).

The employee's regular hours on weekdays are also considered to be the employee's normal work hours on Saturday and Sunday for purposes of this policy. For example, if a non-exempt employee ordinarily works 8:30 a.m. to noon and 1:00 p.m. to 5:30 p.m. on weekdays, then the employee will be paid for travel time on Saturdays and Sundays between the hours of 8:30 a.m. and noon and 1:00 p.m. to 5:30 p.m.

If the staff member is away from home overnight, he/she will not be paid for hours after regular work hours unless the time was spent conducting or participating in required Aspen business as approved by the employee's supervisor.

If a non-exempt staff member is asked to drive other employees to a meeting or seminar, the staff member will be paid for all hours spent traveling as well as for the hours spent at the meeting or seminar.

H. PERFORMANCE REVIEWS

It is the Aspen Institute's goal to conduct performance evaluations annually. Normally, employees will be reviewed for performance on or about their 90-day anniversary, and again annually at the end of the year. Reviews may, however, be

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conducted more or less frequently based upon departmental or supervisory needs. One copy of the completed performance review is given to the employee and another is placed in the employee's human resources file and/or stored in any electronic portal or HRIS system being used.

I. SERVICE RECOGNITION PROGRAM

In recognition of service to the Institute, regular full- and part-time employees will be presented with appropriate gifts after:

- 5 years of service
- 10 years of service
- 15 years of service
- 20 years of service
- 25 years of service, etc

Awards will be presented at the annual year-end staff meeting.

CHAPTER 4: EMPLOYEE LEAVE POLICIES

The nature of our business requires a group effort, and often time is of the essence. Therefore, we require employees to report to work punctually as scheduled and to work all scheduled hours and overtime if necessary. Excessive tardiness and poor attendance disrupt workflow and client service and will not be tolerated. Unauthorized or excessive absences, tardiness, or early departures will result in disciplinary action, up to and including termination.

Employees should notify their supervisor as far in advance as possible whenever they are unable to report for work, know they will be late, or must leave early. Such notification should include a reason for the absence and an indication of when the employee can be expected to report for work. Any absence of three or more business days will require medical certification.

Regular full-time and regular part-time employees begin accruing vacation and sick leave after one month of employment. Leave time may not be taken before it is earned. In extenuating circumstances, it may be up to the supervisor's discretion to approve unpaid leave.

Both vacation and sick leave are calculated on a monthly basis. Exempt and non-exempt employees must report leave usage through Paylocity for supervisor approval

A. VACATION LEAVE

In the first three years of an employee's service, regular full-time employees accumulate 10 hours of vacation leave per month. Regular part-time employees accumulate 5 hours of vacation leave each month (provided they work at least a 20-hour workweek). Temporary employees do not accrue vacation leave.

After completing their third year of employment, full-time employees accrue 13.36 hours of vacation leave per month. Regular part-time employees accrue 6.68 hours of vacation leave each month (provided they work at least a 20-hour workweek).

Employees must receive approval from their supervisor prior to taking planned vacation time.

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Employees in locations other than California may carry over up to 10 vacation days (80 hours) at the end of the year. There may not be more than 80 total hours carried over at the end of any year (i.e. this time does not compound).

Exempt employees who do not submit all leave to payroll by January 15th will not be allowed to carry over any vacation hours.

For California employees, there is no limit on the amount of vacation leave that may carryover. However, once the vacation balance of a California employee reaches 160 hours (20 days), that employee will not accrue further vacation leave until leave has been taken that reduces their balance below 160 hours.

For Colorado employees, there is no limit on the amount of vacation leave that may

carry over, however, once the vacation balance reaches 120 hours or 160 hours depending on accrual schedule, the employee will not accrue further vacation leave until leave has been taken that reduces their balance below 120 hours or 160 hours.

The Aspen Institute's exempt employees do not punch a clock, but are expected to work the necessary hours to fulfill their job responsibilities. Exempt employees who miss less than half a day are not expected to use leave, but should use leave for absences of a half day or more.

Due to the nature of exempt employees' jobs, there will be times when working in the office during lunch breaks, on weekends, or evenings will be necessary. Exempt employees are not eligible for overtime pay, however, in exceptional circumstances, exempt employees who have worked abnormally long hours for such reasons as business travel or to complete a time-sensitive project may be allowed to take some additional time off with pay. Such informal days off are based on the supervisor's discretion and not on any mathematical calculations of the number of hours worked. Such time off is not guaranteed to exempt employees, and no supervisor is required to grant compensatory time off to exempt employees.

The Federal Fair Labor Standards Act (FLSA) prohibits employers from allowing non-exempt (hourly) employees from taking "comp time" or additional leave in lieu of overtime pay. Adjustments of an hourly employee's work schedule within a single workweek (Monday to Sunday) may be possible, but if an hourly employee works more than 40 hours per week, he or she must be paid overtime.

**For exempt employees whose program receives a federal grant, please contact your designated financial analyst for further instructions.*

Unused Vacation Pay-Out

Any earned but unused vacation time will be paid to the employee at termination. If an employee leaves the Institute prior to the 15th of the month, the employee will not earn vacation accrual for that month.

B. SICK LEAVE

Regular full-time employees accumulate 8 hours of sick leave per month. Regular part-time employees accumulate 4 hours of sick leave each month (provided they work at least a 20-hour workweek).

Employees may carry over unlimited amounts of sick leave from year to year. However, employees may not accumulate more than 60 days (480 hours) of sick leave. Employees whose sick leave balances reach 480 hours will not accrue further sick leave until their sick leave balance falls below 480 hours.

Sick leave may be used for any of the following purposes:

- An absence resulting from a physical or mental illness, injury, or medical condition of the employee (including pregnancy and childbirth).
- An absence resulting from obtaining professional medical diagnosis or care or preventive medical care for the employee (provided the employee has made a reasonable effort to schedule such leave in a way that does not unduly disrupt Aspen operations).
- An absence for the purpose of caring for a family member or loved one who has an illness, injury, or medical condition.
- An absence when the employee or a family member has been the victim of stalking, domestic violence, or sexual violence, as defined by the D.C. Accrued Sick and Safe Leave Act.

For sick leaves due to injury, illness, or disability lasting three consecutive days or longer, the Aspen Institute will require certification by a health care provider showing the employee was unable to work or was contagious or that the family member was ill or injured and in need of care. This certification should be forwarded to the Benefits Administrator. We reserve the right to request medical certification when deemed necessary even if the absence is not 3 consecutive days.

Except in the case of approved FMLA, extended sick leave for family members must be approved by the supervisor in advance and is based on business needs.

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It is the responsibility of the employee to record time off in Paylocity. It is the supervisor's responsibility to review and approve employee leave requests to ensure that leave usage is accurately recorded and that the employee has available leave prior to using the leave. Employees are not permitted to use unearned leave.

Temporary employees in the District of Columbia will accrue paid sick leave at a rate of one hour of paid leave for every 37 hours worked. Temporary employees may not use sick leave until they have 90 days of service with Aspen. Each day an employee completes their regular work schedule counts as a day of service. Temporary employees in San Francisco who have been employed by The Aspen

Institute for 90 days or more accrue sick leave at the rate of one hour for every 30 hours worked.

Effective September 30, 2020 covered temporary employees in New York State began to accrue leave at a rate of one hour for every 30 hours worked. **On January 1, 2021**, employees may start using accrued leave. Temporary employees in New York State will be provided up to 56 hours of paid sick leave per calendar year.

Upon termination, employees are not paid for any unused sick leave.

Families First Coronavirus Response Act (FFCRA) Leave

Through **September 2021**, employees have the ability to use FFCRA (Families First Coronavirus Response Act) leave for time away for COVID related reasons including school closings, COVID-19 testing and vaccination, and time to recover from receiving the vaccination. See full policy details [here](#)

C. HOLIDAYS/FLOATING DAYS/CULTURAL HERITAGE DAYS

The Aspen Institute observes at least 10 paid holidays each year. A schedule indicating the actual date on which the following holidays are observed will be sent to employees at the beginning of each year. **Please note that observed holidays are subject to change.**

Typical holidays include:

New Year's Day
Martin Luther King, Jr., Day Veteran's Day

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Presidents' Day Thanksgiving Day
Memorial Day Day after Thanksgiving
Independence Day Christmas Day
Labor Day Presidential Inauguration ****Juneteenth (June 19th) will be observed formally starting in 2022.**

Floating Day (one annually) – these are days to be used as a personal day for employees to use for any reason. This day does not roll over into the next year if unused.

Cultural Heritage Days (two annually) – these new leave days are designed to allow staff to celebrate and observe cultural, religious, and other holidays or events that are important and meaningful to them for any reason. Cultural Heritage Days will be allocated at the beginning of each calendar year and, like Floating Days, will not roll over into the next year if unused.

D. HOLIDAY PAY

1. Year-Round Exempt Employees

Year-round exempt employees are eligible to receive paid holidays from the time of hire.

2. Year-Round Non-exempt (hourly) Employees

Non-exempt employees are eligible to receive paid holidays from the time of hire only if the holiday falls on their regularly scheduled workday. For example, if an employee is not normally scheduled to work Mondays and the holiday falls on a Monday, the employee would not receive holiday pay. The number hours of holiday pay will equal the normal hours worked. For example, a part-time employee who normally works 4 hours per day would receive 4 hours holiday pay.

3. Temporary Employees

Temporary employees and interns will only be paid for the hours worked, and will not receive holiday pay.

E. JURY DUTY

The Aspen Institute supports both full-time and part-time employees reporting for jury duty and allows unlimited paid leave for this purpose. However, to be paid while serving on jury duty, employees must submit a copy of the summons to their supervisor and to the Human Resources Department. The Aspen Institute will pay the employee's regular wages during jury duty. Employees summoned to court for reasons other than jury service or official Institute business are required to use their accumulated vacation time or to take unpaid leave.

F. MILITARY LEAVE

An employee who is a member of the United States Army, Navy, Air Force, Marines, Coast Guard, National Guard, Reserves or Public Health Service will be granted an unpaid leave of absence for military service, training or related obligations in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA) and other laws relating to the rights of veterans. Employees on military leave may substitute their accrued paid leave time for unpaid leave. At the conclusion of the leave, upon the satisfaction of certain conditions, an employee generally has a right for up to five years of military service to return to the same position he/she held prior to the leave or to a position with like seniority, status and pay that the employee is qualified to perform.

During a military leave of less than 31 days, an employee is entitled to continued group health plan coverage under the same conditions as if the employee had continued to work. For military leaves of more than 30 days, an employee may elect to continue their dependent health coverage for up to 24 months of uniformed service, but will generally be required to pay the full premium for the continuation coverage.

An employee requesting military leave of absence must notify the EVP, their supervisor and Human Resources and provide a copy of the official orders. Consistent with federal law, the Aspen Institute will reemploy returning veterans who apply for reinstatement within 90 calendar days after release from active duty. This reinstatement will be to the employee's original position or to an equivalent position (as determined by the Aspen Institute). Returning veterans will be treated

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as though they had remained actively employed by the Aspen Institute during the period of military leave with regard to accrual of leave.

The provisions of USERRA are complex, so persons planning to take military leaves of absence should consult with the Human Resources Department for more information about their rights.

After six months of employment, The Aspen Institute will pay the employee any difference between their military pay (including base and living allowance) and their regular base pay for a period of up to two weeks in a calendar year.

G. BEREAVEMENT LEAVE

Regular full-time and part-time employees will be granted up to three days of paid bereavement leave on each occasion of a death of a brother, sister, aunt, uncle, niece, nephew, grandparent and grandchild and up to five days of paid bereavement leave on each occasion of a death of a spouse, parent or child (including in-law).

H. FEDERAL FAMILY AND MEDICAL LEAVE ACT

The federal Family and Medical Leave Act (FMLA) requires employers to provide eligible employees with up to 12 weeks of unpaid, job-protected leave in any 12-month period for certain family and medical reasons. The 12-month period is a rolling period measured backward from the date an employee uses any FMLA leave. Federal law exempts locations with fewer than 50 employees from FMLA leave requirements. However, the Aspen Institute voluntarily attempts to make federal FMLA leave available at all of its locations, regardless of the number of employees, based on its understanding of the requirements of federal law.

Employee Eligibility

To be eligible for federal FMLA benefits, an employee must have worked for the Aspen Institute for at least 12 months and have worked at least 1,250 hours over the previous 12 months.

Leave Entitlement

The Aspen Institute will grant an eligible employee up to a total of 12 workweeks of federal FMLA leave during any 12-month period for one or more of the following reasons:

- for the birth and care of the newborn child of the employee;

- for placement with the employee of a son or daughter for adoption or foster care;
- to care for an immediate family member (spouse, child, or parent) with a serious health condition; or
- to take medical leave when the employee is unable to work because of a serious health condition.

Eligible employees with a spouse, child, or parent on active duty or called to active duty in the National Guard or Reserves in support of a contingency operation may also use their 12-week leave entitlement to address certain “qualifying exigencies,” as defined by law. Please contact Human Resources for more information about the definition of “qualifying exigencies” or consult the Department of Labor’s website at <http://www.dol.gov/whd/regs/compliance/whdfs28a.pdf>.

Spouses employed by the same employer are jointly entitled to a **combined** total of 12 work-weeks of family leave for the birth and care of the newborn child, for placement of a child for adoption or foster care, and to care for a parent or child who has a serious health condition. FMLA leave is unpaid unless the employee has accrued sick or vacation leave that provides pay during the period of unpaid leave.

Leave for birth and care, or placement for adoption or foster care must conclude within 12 months of the birth or placement.

Under some circumstances, employees may take FMLA leave intermittently — which means taking leave in blocks of time, or by reducing their normal weekly or daily work schedule.

- If FMLA leave is for birth and care or placement for adoption or foster care, use of intermittent leave is subject to the employer's approval. • FMLA leave may be taken intermittently whenever medically necessary to care for a seriously ill family member, or because the employee is seriously ill and unable to work. Medical certification is required prior to granting intermittent leave and the schedule must be arranged in advance with the supervisor. If leave is required on an intermittent basis or reduced leave basis, the Aspen Institute may require the employee to

transfer temporarily to an alternative position that better accommodates the intermittent leave or a part-time schedule, provided the position has equivalent pay and benefits.

- Please note that it may not be possible to provide intermittent leave for exempt employees at Aspen locations where there are fewer than fifty employees within a seventy-five mile radius. Allowing intermittent leave for such employees may destroy their exempt status under the federal wage and hour laws.

"Serious health condition" means an illness, injury, impairment, or physical or mental condition that involves either:

- any period of incapacity or treatment connected with inpatient care (i.e., an overnight stay) in a hospital, hospice, or residential medical-care facility, and any period of incapacity or subsequent treatment in connection with such inpatient care; or
- Continuing treatment by a health care provider which includes any period of incapacity (i.e., inability to work, attend school or perform other regular daily activities) due to (1) a health condition lasting more than three consecutive days, and any subsequent treatment or period of incapacity relating to the same condition that involves treatment by a health care provider; (2) pregnancy or prenatal care, including severe morning sickness; (3) a chronic serious health condition that continues over an extended period of time, requires periodic visits to a health care provider, and may involve occasional episodes of incapacity; or (4) a permanent or long-term condition for which treatment may not be effective (e.g., Alzheimer's, a severe stroke, terminal cancer) if the employee is under the supervision of a health care provider; or (5) any absences to receive multiple treatments for restorative surgery or for a condition which would likely result in a period of incapacity of more than three days if not treated).

Employees may use paid leave during an FMLA leave. However, any paid leave that is used will count toward FMLA leave, and use or availability of paid leave during FMLA leave will not extend the length of the FMLA leave of absence beyond the 12-week maximum period permitted by federal law.

Unless a waiver is specifically requested by the employee and granted (which will be done only in exceptional circumstances), employees must use any accrued paid

sick leave during an unpaid FMLA leave taken because of the employee's own serious health condition or the serious health condition of a family member.

Notice and Certification

Employees who want to take federal FMLA leave ordinarily must provide at least 30-day advance notice of the need for leave, when the need is foreseeable. If the need is not foreseeable, employees should give as much notice as practical. When leave is needed to care for planned medical treatment, the employee must try to schedule treatment in order not to unduly disrupt the Aspen Institute's operations. During the FMLA leave, periodic updates of the expected return to work date may be required.

In addition, employees who take FMLA leave due to a medical condition of their own or a family member must provide medical certification from a health care provider. The Aspen Institute also may require a second and, if necessary, a third opinion (at the Aspen Institute's expense), periodic recertifications of the serious health condition and the employee's intent to return to work, and a fitness of duty report to return to work.

When an employee takes a leave of absence to care for a member of their family, the Aspen Institute may require documentation confirming the family relationship, such as a birth certificate, marriage license, or other official document.

Benefits During Federal FMLA Leave

Employees taking federal FMLA leave are entitled to receive health benefits during the leave at the same level and terms of coverage as if they had been working throughout the leave. The Aspen Institute will attempt to provide ongoing health benefits for employees taking FMLA leave at locations with too few employees to qualify for federal FMLA leave, to the extent permitted by the health insurance policy. Employees must continue to pay their share of health insurance premiums while on leave. If an employee chooses not to return to work after federal FMLA leave, the Aspen Institute may choose to require the employee to repay the premiums paid by the Aspen Institute during the leave period unless the employee cannot return due to a serious health condition or other circumstances beyond the employee's control. Sick and vacation leave does not accrue during unpaid Family or Medical Leave.

Job Restoration

employee's original job, or to an equivalent job with equivalent pay, benefits, and other terms and conditions of employment. In addition, an employee's use of FMLA leave will not result in the loss of any employment benefit that the employee earned or was entitled to before using FMLA leave. Under limited circumstances where restoration to employment will cause substantial and grievous economic injury to its operations, the Aspen Institute may refuse to reinstate certain highly paid "key" employees after using FMLA leave in accordance with FMLA regulations. The Aspen Institute would do this only after notice to the employee and an opportunity to return to work.

An employee may be required to obtain a medical certification form from his or her health care provider stating that the employee is able (or unable) to return to work (i.e., a "fitness-for-duty" report).

Non-Retaliation

The Aspen Institute prohibits retaliation against any employee for the exercise of their rights under the federal FMLA or any state, D.C., or local law regarding employee leaves. Any employee who believes that he or she has been treated unfairly because of the exercise of FMLA rights should contact the Director of Human Resources.

Further Information

Employees who wish further information should consult the FMLA poster, consult the Department of Labor's "Fact Sheet" about the federal FMLA (available at <http://www.dol.gov/esa/regs/compliance/whd/whdfs28.htm>), or contact the Director of Human Resources.

FMLA Military Caregiver Leave

The Family and Medical Leave Act (FMLA) provides an employee who is eligible under the FMLA and who is the spouse, son, daughter, parent, or next of kin of a covered service member who is recovering from a serious illness or injury sustained in the line of duty on active duty up to 26 workweeks of unpaid leave in a single 12-month period to care for the service member. This military caregiver leave is available during "a single 12-month period" during which an eligible employee is entitled to a combined total of 26 weeks of all types of FMLA leave, measured forward from the date an employee first takes FMLA Military Caregiver leave.

During this leave, the military caregiver is entitled to continued group health plan coverage as if the employee had continued to work. At the conclusion of the leave, subject to some exceptions, an employee generally has a right to return to the same or to an equivalent position.

Employees who wish to request Military FMLA leave should contact Human Resources about the required documentation. When leave is foreseeable the employee must provide at least 30 days advance notice. When the timing of the leave is not foreseeable, the employee must provide notice of the need for leave as soon as possible.

The procedures applicable to other types of FMLA (set forth above) are also applicable to FMLA Military Caregiver leave, except with respect to the 26 week period of available leave.

District of Columbia Family and Medical Leave

The District of Columbia Family and Medical Leave Act (FMLA) requires employers to provide eligible employees working in the District of Columbia with up to 16 weeks of unpaid, job-protected medical leave and up to 16 weeks of unpaid, job-protected family leave in any 24-month period for certain family and medical reason. The 24-month period is a rolling period measured backward from the date an employee uses any FMLA leave. In most (but not all) cases, the D.C. FMLA provides more generous leave benefits than the federal FMLA. D.C. FMLA leave runs concurrently with federal FMLA leave.

To be eligible for District of Columbia FMLA benefits, an employee must have completed one year of unbroken service for the Aspen Institute, worked at least 1,000 hours over the previous 12 months and worked within DC at least 50% of time.

The Aspen Institute will grant an eligible employee up to a total of 16 workweeks of family leave and a total of 16 workweeks of medical during any 24-month period for one or more of the following reasons: (a) birth of a child and to take care of a newborn child; (b) adoption of a child or placement of a child with an employee for foster care; (c) because of a serious health condition that makes the staff member unable to perform the functions of their job; or (d) to provide necessary care for the serious health condition of a member of an employee's family. Family leave must be taken within 12 months of the birth or placement of the child. D.C. FMLA leave is unpaid unless the employee has accrued leave that provides pay during the period of unpaid leave.

Under D.C. law, a serious health condition is defined as a physical or mental illness, injury, or impairment that involves (a) inpatient care in a hospital, hospice, or residential health care facility, or (b) continuing treatment or supervision at home by a health care provider or other competent individual. A family member is defined under D.C. law as including a person to whom the person is related by blood, legal custody, or marriage; a child who lives with the employee for whom the employee permanently assumes parental responsibility, and a person with whom the employee has shared a residence within the past year and maintains a committed relationship.

If two family members work for the Aspen Institute in the District of Columbia, the Aspen Institute may limit to 16 workweeks during a 24-month period the aggregate number of family leave workweeks to which the family members are entitled and may limit to 4 workweeks during a 24-month period the aggregate number of family leave workweeks to which the family members are entitled to take simultaneously.

The rules applicable to federal FMLA leaves also apply to D.C. FMLA leaves unless inconsistent with District of Columbia law. For more information, contact the Director, Human Resources or consult the poster about the D.C. FMLA.

I. PARENTAL LEAVE

The Aspen Institute seeks to provide parental leave benefits that exhibit our commitment to operating as a values-based Institution. We recognize an employee's need and desire to spend time after the birth or adoption of a child to bond and integrate into the family. To support this, the Aspen Institute has developed a comprehensive leave program which will allow for 8 weeks of paid parental leave.

Childbirth

- Regular full time and regular part time employees with one year of continuous service will be eligible for short-term disability benefits immediately following childbirth (with the usual seven-day waiting period). While short term disability normally provides for 2/3 pay, Aspen Parental leave will allow the child bearing parent to be paid 100% of salary for 6 weeks. Any STD prescribed by physician beyond 6 weeks would be at the normal 2/3 pay, per Aspen regular leave benefits.

Child Adoption or Care of Newborn

The following applies to regular full and regular part time employees with one year of continuous service.

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- A non-childbearing parent or adopting parent will be eligible for 6 weeks of paid leave for the care of a child and adjustment to their new family situation. • This leave should be utilized within 8 months of the birth or adoption, and any unused parental leave will be forfeited. This leave may be used all at once or intermittently within the 8 month period.
- Employees are eligible to use this leave once in a 12-month rolling period.
Multiple births or adoptions do not increase the length of this parental leave.

Regular full time and regular part time employees with at least 6 months of service may also take up to 2 weeks of Aspen paid family leave in any two-year period for the care of a newborn or newly adopted child, in addition to this leave being available for other family medical situations. This leave cannot be rolled over from year to year and any unused leave is not eligible for payment.

Accrued vacation and sick time may also be used to provide pay following childbirth or adoption.

Employees who meet FMLA requirements may use a combination of all these leave benefits, plus unpaid leave to take up to the maximum amount of leave available as provided by federal or DC FMLA following the birth of a child. Paid parental leave under this policy will run concurrently with leave under federal FMLA and DC FMLA.

Temporary, interns, and part time employees who are not benefits eligible are not entitled to this leave.

J. ASPEN PAID FAMILY LEAVE BENEFIT

The Aspen Institute recognizes that employees sometimes need to take a short amount of time off to deal with family medical issues, such as the birth or adoption of a child, or the care of a spouse, partner or elderly parent. We believe providing this type of short-term leave supports our value of promoting balanced, integrated lives for our employees. Accordingly, any regular full-time or regular part-time

employee with at least six months of prior service may take up to two weeks of paid leave in any 2-year period for the care of any child born within the prior four months, an adopted child, or for the care of a seriously or terminally ill child, spouse/partner, or parent. Temporary employees are not eligible for the paid family leave benefit.

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Employees must notify their supervisor at or prior to the time the leave is taken. In addition, employees may liberally use their accrued sick and vacation leave for such purposes.

District of Columbia Universal Paid Leave (D.C. Paid Family Leave)

The Paid Leave Act provides up to:

- 8 weeks to bond with a new child
- 6 weeks to care for a family member with a serious health condition
- 2 weeks to care for your own serious health condition

Additional information on this leave is found [here](#). Employees can contact the [DC Department of Employment Services](#) directly for information on using this leave.

K. SHORT-TERM DISABILITY

The Aspen Institute will reimburse eligible regular full-time and regular part-time employees who are unable to work due to disability up to 66 2/3 percent of their monthly salary to a maximum of \$5,000 per month for up to three months.

Temporary employees are not eligible for short-term disability payments. To be eligible, regular full-time and regular part-time employees must be disabled for seven consecutive calendar days and must have completed one year of service. Proof of medical disability will be required by the sick leave management administrator.

L. UNPAID LEAVE OF ABSENCE

If, during employment with the Institute, personal circumstances require that an employee take an extended period of time off, a personal unpaid leave of absence may be requested.

Regular full-time employees who have completed one full year of service are

eligible to apply for a leave of absence. Regular part-time and temporary employees are not eligible for unpaid leaves of absence. Written requests for leave must give the reason for the leave, the requested starting date of the leave, and the employee's anticipated date of return.

All requests for personal leaves of absence must be submitted to the employee's supervisor, and the Benefits Administrator. Leaves in excess of 30 days must have approval from Department or Program Head and Executive Vice President. Leaves are authorized on the basis of (1) the reason for the request, (2) the department's

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staffing needs, and (3) the work history and performance of the employee. In any case, while on unpaid leave, vacation and sick leave will not accrue and retirement premiums and contributions will cease until the employee's return.

Please note that there are limits on the time period when benefits may continue during an unpaid leave of absence. Currently, long term care insurance is available only to active employees; life, AD&D, and long-term care insurance is available only for one month of a leave of absence; and health insurance is only available for a 90-day leave of absence (thereafter any continuation of health insurance would be pursuant to COBRA). Life and AD&D, and LTD premiums will be the responsibility of the employee during any unpaid absence. Please check with the Benefits Administrator prior to requesting any unpaid leave of absence to ensure that you understand the rules in effect at that time concerning continuation of benefits.

M. SCHOOL EVENTS LEAVE

The Aspen Institute provides unpaid leave of up to 24 hours per year for its D.C. employees who are parents to attend school-related events for which their child is a participant or a subject, in accordance with the D.C. Parental Leave Act. Annual leave may also be used for this purpose. School events leave must be coordinated with your supervisor in advance, unless the need to attend the school-related event cannot be reasonably foreseen.

N. VOLUNTEERING AND CIVIC ENGAGEMENT LEAVE (Updated June 2020)

The Aspen Institute broadly recognizes the importance of an engaged citizenship, with it being our responsibility to stay involved in our communities and helping to

enrich them. To further this idea as well as our mission statement, we encourage our employees to become involved in volunteering their time and talents and staying civically engaged to help positively impact the quality of life of others within our communities. In order to allow employees to take up volunteering and civic engagement, the Aspen Institute will offer one day of paid volunteering and civic engagement leave per year under charitable leave to employees who wish to take a personal day to engage in such activities, provided it is in their individual capacity and unaffiliated with the Aspen Institute.

Eligibility

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All regular full-time and part-time employees who work at least 20 hours per week and who have successfully completed 6 months of employment are eligible to request up to one personal day under charitable leave (8 hours) annually to be used for volunteering or civic engagement. Requests should be submitted to the employee's direct supervisor for approval. Unused volunteering and civic engagement leave may not be carried over into another calendar year and will not be paid to employees upon termination of employment.

In general, such leave may be used to support organizations and programs related to improving the local communities of the employee, or the global community at large. For example, employees might volunteer with schools, churches, human services organizations, other nonprofit organizations, or government agencies. The employee may use the personal day as a participant in other civic engagement activities as the employee sees fit.

Notwithstanding the flexibility offered by the Institute with this leave, this volunteering and civic engagement is an employee's personal time and must be done in the employee's individual capacity and unaffiliated with the Aspen Institute.

As a reminder — for clarity's sake — the Aspen Institute is a 501(c)(3) public charity and does not engage in or support partisan political activities, in support of (or against), candidates seeking elected office or political parties. The Aspen Institute also is subject to strict lobbying restrictions. Therefore, employees must stay mindful of those limitations on the organization and take particular care to avoid mistaken attribution or affiliation. Further, all other Aspen Institute policies remain in effect, including, but not limited to, the Aspen Institute's Code

of Conduct.

Time Allowed

Eligible employees may request up to one charitable day (8 hours) of leave per calendar year for volunteering and/or civic engagement. The Aspen Institute prefers that the time be scheduled either as a full-day's leave or first thing in the morning or late in the afternoon in order to lessen the impact on work. This leave includes reasonable local travel time to or from where it occurs, however, because these activities are in the employee's individual capacity and unaffiliated with the Aspen Institute, the employee may not use Aspen Institute resources in connection with

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them and will not be reimbursed for any associated expenses, including travel expenses related to the activities. Additionally, time granted for volunteer service is not considered hours worked for the Aspen Institute and the day(s) that leave is granted is not a factor in determining overtime for non-exempt employees.

Processing Requests

Any employee wishing to schedule this leave should request approval from their supervisor as soon as is reasonably possible, mindful of the employee's work obligations. The employee should forward the approved request to the Jacque Burke in Human Resources for leave tracking and Paylocity approval. The approval of scheduling of this leave is at the sole discretion of the employee's manager based upon the business needs during the time period.

Scheduling of Leave

Use of this leave should not conflict with peak work periods specific to each employee's position, create a need for overtime for non-exempt employees, or cause resulting changes to other employees' schedules. Approval/denial may be based on the work schedule of the individual or department and are subject to an employee's work being in good standing. The Aspen Institute does not sponsor any activity while using this leave, and therefore, should any injury occur during use of this leave, the Aspen Institute is not responsible for costs or damages related to the injury.

CHAPTER 5: EMPLOYEE BENEFITS

This section provides a summary of the benefits available to Aspen Institute employees. These benefits are provided through contracts with outside insurance providers, pursuant to detailed policies. *In the event of a conflict between this brief summary and the terms of the detailed policies, the language of the policies themselves will be controlling – not the summary language in this Handbook.*

A. BENEFITS AVAILABLE TO EMPLOYEES BY CLASSIFICATION

Regular Full-Time Employees (working 30 hours per week or more) are eligible for all Aspen benefits

Regular Part-Time Employees (working 20 – 29 hours per week) are eligible for all Aspen benefits but accrue sick and vacation leave at half the full time accrual rate

Part Time Employees working less than 20 hours are not eligible for benefits

Interns and Temporary Employees are eligible for statutory benefits including Social Security, Medicare, Unemployment, and Worker’s Compensation. Temporary employees and interns who work at least 30 hours per week will be eligible to enroll in health care coverage after 90 days of employment. However, for “seasonal employees,” the determination of whether they average 30 hours a week is made on a full-year basis. .

B. HEALTH/VISION/DENTAL COVERAGE

Health, vision and dental coverage are available for regular full-and part-time employees who work 20 hours per week or at least 1,000 hours a year.

Year-round employees become eligible on the first day of the month following completion of 30 days of continuous service.

The Aspen Institute sponsors a comprehensive health, dental and vision insurance plan for eligible employees. The plan is partially contributory and includes coverage for the employee's spouse, domestic partners and dependent children.

Once eligible, employees will be enrolled in the Aspen Institute's self-funded plan. The Benefits Administrator will provide enrollment materials and contribution schedules with the benefits package. Before using the health/dental/vision insurance

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plan, employees should carefully read the plan documents to determine the exact level of coverage.

Contributions will be withheld (by employee's written authorization) on a pre-tax basis, from each bi-weekly paycheck. Employees who do not wish to participate in the health/dental/vision plan, must sign a waiver declining coverage.

If coverage is declined during the initial enrollment period, a proof of insurability questionnaire must be completed and the employee may be subject to medical underwriting guidelines for future enrollment. Additionally, an employee may be required to wait until annual open enrollment or experience a qualifying life event should coverage be declined at initial enrollment period.

C. COBRA – CONTINUATION OF HEALTH BENEFITS

If an employee resigns or is terminated from the Institute, or if their work hours are reduced, to where they or their dependents are no longer eligible to participate in the Institute's group health insurance plan, the employee and their eligible dependents may have the right to continue to participate in the plan for up to 18 months at the employee's (or their dependents') expense. Eligible dependents may extend coverage, at their expense, for up to 36 months in the event of the employee's death, divorce, legal separation, or enrollment for Medicare benefits, or when the child ceases to be eligible for coverage as a dependent under the terms of the plan. More COBRA information is included in the health care summary plan description

and in the federal government regulations pertaining to COBRA.

D. LIFE INSURANCE

Life insurance is available for regular full-time and regular part-time employees who work at least 20 hours per week. Employees become eligible on the first day of the month following the first day of employment.

The purpose of life insurance is to provide a measure of financial security for employee dependents in the event of the employee's death. The Aspen Institute provides group term life insurance coverage for eligible employees. The basic benefit includes twice annual salary to a maximum amount set forth in the policy. See group term life policy for full details. When employees are eligible for life insurance coverage, they are also automatically eligible for accidental death and

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dismemberment (AD&D) paid for by the Aspen Institute. The amount of coverage for this insurance is equal to the basic life insurance amount.

E. LONG-TERM DISABILITY BENEFITS

Long-term disability insurance is available for regular full-time and regular part time employees who work at least 20 hours per week. Employees become eligible on the first day of the month following the first date of employment.

Coverage includes benefits payable as of the first of the month after 90 days of continuous total disability. Benefits are payable at 66 2/3 percent of your "monthly wage base," not to exceed either \$10,000 per month or \$15,000 per month (depending on the employee's salary level), subject to certain restrictions set forth in the policy.

F. LONG-TERM CARE INSURANCE

Long-term care insurance is available to all regular full-time and regular part-time employees. Long-term care insurance provides the following benefits to covered employees (subject to certain restrictions set forth in the policy):

- Facility and Professional Home Care at \$2,000 per month
- Assisted Living Facility: 100% of benefit

- Home Care: 100% of benefit
- Benefit duration: 2 years
- Elimination Period, once per lifetime: 90 days
- Lifetime maximum: \$48,000

G. WORKERS' COMPENSATION

Workers' compensation insurance is available for all employees. Employees become eligible immediately.

The Workers' Compensation Act provides that certain benefits be paid in the event of injury or disease resulting from or during the course of a person's employment.

If employees needs medical care because of injury or illness that is related to the job, they may receive benefits through Workers' Compensation. All employee injuries or accidents should be reported to the employee's supervisor and the Human Resources Department.

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H. RETIREMENT PLANS

The Aspen Institute offers a 403(b) plan ("Plan"). The Plan provides for employee elective deferrals, matching contributions, and employer contributions. Participants are vested in the matching and employer contributions immediately. A brief overview of the benefits available under the Plan is set forth below. However, in the event of any conflict between the description set forth below and the terms of the Plan document, the terms of the Plan document shall govern. In addition, the Aspen Institute reserves the right to make changes to the terms of the Plan document at any time.

TIAA-CREF Voluntary Group Supplemental Retirement Program **(GSRA) Elective Deferrals**

Employees are permitted to make elective deferrals (i.e., contribute a portion of compensation on a tax-deferred basis) under the Plan as soon as administratively feasible following commencement of employment.

Matching Contributions

Eligible employees begin to receive matching contributions (i.e., contributions made by the Institute on behalf of an employee on account of an elective deferral made by such employee) as of the first day of the first month following completion of 1 year of eligibility service and attainment of age 21. Each year, the

Institute will make matching contributions equal to 100% of a participant's contributions up to 5% of compensation. Matching contributions are only available to employees hired after February 1, 2002.

TIAA-CREF Retirement Annuity (RA)

Employer Contributions

Eligible employees begin to receive employer contributions (*i.e.*, contributions made by the Institute on behalf of an employee without regard to the employee's elective deferrals) as of the first day of the first month following completion of 1 year of service and attainment of age 21. Each year, the Institute will make employer contributions equal to a percentage of a participant's compensation, based on the participant's years of service as follows.

Years of Service	Contribution Percentage
Less than or equal to 1 year	0%
Greater than 1 but less than or equal to 3 years	5%
Greater than 3 but less than or equal to 5 years	7%
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Greater than 5 years	10%

In lieu of the above contribution schedule, with respect to an employee hired before February 1, 2002, an employer contribution equal to 15% of compensation will be made each year on behalf of such an employee.

More information regarding the Plan can be found in the Plan's summary plan description.

I. RETIREE HEALTH COVERAGE

Under the Aspen Institute's current health insurance policy, eligible employees who retire from the Aspen Institute may choose to remain on the Institute's group health insurance plan. To be eligible for this option, employees either must have reached the age of 62 and have worked for the Institute at least 18 years, or must have a total "rate factor" of 80, calculated by adding the number of years of service to the Institute and their age. For instance, employees who have 15 years of service and are 65 years old, or 10 years of service and 70 years old, would qualify for the coverage. The retiree will be billed monthly for the entire cost of the premium.

J. OTHER BENEFITS

- The Aspen Institute offers a variety of other benefits to its employees, including:
- Flexible Spending Accounts to assist with out of pocket health care and day care expenses;
 - Tuition assistance program providing up to a maximum of \$3,000 per year;
 - An Employee Assistance Program (EAP), which is a confidential service providing counseling, legal and financial information, and other resources for work-life needs;
 - A Travel Assistance program for emergencies that arise during travel;
 - A Tax Commuter Benefit program.
 - A brochure of Aspen Institute benefits can be found on AspenNet and [here](#)

Please contact Human Resources to obtain more information about these and many more benefits.

CHAPTER 6: EMPLOYMENT PROCEDURES

A. HUMAN RESOURCES DEPARTMENT

The Institute's Human Resources Department is located in the Washington, DC office. The Human Resources Department is responsible for maintaining personnel files and assisting employees with human resource issues.

Information regarding an employee's status at the Aspen Institute is confidential and will not be disclosed without the employee's written consent or pursuant to subpoena or court order; the only exception to this policy is the disclosure of dates of employment and position title.

No more than once a year, an employee may review their own personnel file by scheduling an appointment with the Human Resources Department during regular business hours. Former employees are not allowed to review personnel files.

Employees should report personal injuries, lost, damaged or stolen Institute credit cards, insurance cards, office keys, or office equipment to the office manager at each location and the Human Resources Department immediately.

Human Resources department hours are: 9:00 a.m.-5:00 p.m. ET in Washington, D.C., Monday through Friday.

B. PERSONAL STATUS CHANGES

Employees are responsible for notifying their supervisor, in certain cases, and the Human Resources Department of any changes in their personal status or their family's personal status, such as births, deaths, and marital status, as well as change of name, address, telephone number, the person to notify in case of an emergency, and any additions, deletions, or name changes of dependents or beneficiaries. Accurate records will help ensure that an employee's net pay reflects the proper deductions, that benefits cover all eligible dependents and beneficiaries, and that the Institute may be able to contact the employee or a designated person in the case of an emergency.

C. HIRING NEW EMPLOYEES

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When a position is available, the hiring manager should work with HR to review the existing position description. HR will assist in posting all open positions on the Aspen Institute website and on other recruiting avenues.

The hiring supervisor will complete the hiring process by completing a "Personnel Action Form (PAF)" and return it to the Human Resources Department. The Human Resources Department will draft an offer letter formally communicating the employment offer to the selected candidate. This letter will indicate, among other things, the employee's name, address, title, employment status, starting date, and whether benefits are applicable. Upon request, a draft letter will first be sent to the hiring manager for review and approval.

The Human Resources Department will send the offer letter to the new employee, will notify all administrative departments of the new hire's upcoming arrival, and will begin onboarding of the new employee. Employees hired outside of this process

cannot be paid through the Aspen payroll until the required documents are received by Human Resources.

D. TRANSFERS

The Aspen Institute encourages employees to take advantage of opportunities for career growth within the Institute. Both employees and supervisors are responsible for ensuring that transfers within the Institute take place with a minimum amount of disruption. Normally, an employee should discuss possible transfers with their current supervisor prior to making a commitment. In every case, the department supervisors involved should discuss the employee transfer prior to any offer being made. The prospective supervisor must notify the Human Resources Department via the completion of a Personnel Action Form.

E. RESIGNATION/TERMINATION

If an employee resigns from their position with the Institute, reasonable notice should be given. Letters of resignation should be addressed to the employee's supervisor with a copy submitted to the Human Resources Department.

If an employee's position is terminated, the employee's supervisor will notify the employee in writing and submit a copy to the Human Resources Department.

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If at all practical and if so desired, an exit interview will be scheduled with the Human Resources Department. Departing employees are expected to return all Aspen property, including building ID cards, keys, credit cards, etc., at the time of termination.

F. EMPLOYEE CONCERNS

Sometimes an employee may have a disagreement with a co-worker or a supervisor. Or, you may feel that your supervisor is not offering you the opportunity or resources to do your job. If this should happen, you should meet with your co worker or supervisor to resolve your differences. However, if this fails or you are not satisfied with the result, please contact the Human Resources Departments to facilitate discussions about your concerns.

G. MOVING AND RELOCATION GUIDELINES

Occasionally, job offers include a Moving/Relocation plan. The following considerations may help the supervisor and the new employee determine the best way to structure an offer. It is recommended that all final agreements be submitted in writing to the Human Resources Department. The Human Resource Department will forward the necessary documentation to Accounting.

- Negotiate a mutually agreeable relocation and reimbursement plan with the prospective employee.
- Document and properly authorize this plan so that HR and Accounting can administer accordingly.
 - Provide the individual with information on IRS classification of “qualified” versus “unqualified” expense. This would not preclude the Institute from reimbursing the individual for unqualified expenses. However, it would affect the amount that would become taxable to the individual. It would be helpful to the individual to have this information for their financial planning.
- Discuss the advantages and disadvantages of the different reimbursement methodologies explained below and select the preferred route.

Reimbursement Methodologies

1. **Direct Payment** - Using this method, the Institute would cut a check payable to the individual for the agreed upon amount. This entire amount would be reported as taxable income. The individual would be responsible for deducting any qualified expenses on their personal tax return.

CHAPTER 7: OFFICE PROCEDURES

A. PERSONAL TELEPHONE CALLS

The Aspen Institute's telephones are provided for official business. Employees should minimize the number and length of personal calls placed or received at the Institute. Employees should make all long-distance personal calls by using a personal telephone credit card.

Extensive amounts of time used for personal phone calls whether on Aspen phones or personal cell phones and the use of personal instant messaging is inappropriate and unacceptable during office hours.

B. INCLEMENT WEATHER AND OTHER EMERGENCY CLOSINGS

The Institute will make its own determination on closings, late openings or early departures due to inclement weather giving primary consideration to the safety of staff and visitors. Criteria that may be considered in making such determinations include, but are not limited to: condition of area roads and ability of staff to get to the office, status and schedules of public transportation and local schools, availability of electrical and phone services at Institute offices, and forecast of coming weather.

Procedures

In the case of inclement weather, the EVP Finance & Administrative Services along with appropriate staff in the affected office location will evaluate the weather conditions and the above listed criteria to determine whether the office will be open, closed, or on a delayed schedule. If the office is closed, opening late, or closing early, employees will be notified via the Emergency Notification System.

Individual employee circumstances may affect an employee's ability to come to work. When the Institute's offices are open during inclement weather, if an employee cannot safely commute, or is otherwise unable to come to work, the employee may request permission to work from home or may decide to activate the Institute's Liberal Leave Policy, which allows employees to use unscheduled vacation leave for inclement weather days. Employees must notify their supervisors if they are choosing to use vacation time and will be off for the day.

If it is determined that the Institute will open late or close early, employees are expected to be at work when the office is open, or may request to work from home

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or take leave, as detailed above. Full and part-time regular employees will be paid for a full day of work if it is a regularly scheduled day of work, even if the office is not open for the full day. Temporary employees and interns will not be paid for time not worked.

Employees that have the ability to work from home should do so if the office is closed for any reason.

If an employee has already requested vacation leave for that day, or is on an approved leave of absence (FMLA, STD, etc.) the leave will still be applied even if the Aspen Institute closes as a result of inclement weather.

CHAPTER 8: Travel & Expense Reimbursement

Policy [See updated "Credit Card, Travel, & Expense Reimbursement" policy

[here.](#)]

**ACKNOWLEDGEMENT OF RECEIPT OF EMPLOYEE
HANDBOOK**

I hereby acknowledge receiving the Aspen Institute Employee Handbook. I agree to read the Handbook and familiarize myself with all of its contents in the near future. Prior to signing, I have already read the policy of Equal Employment Opportunity, the Code of Business Conduct, the Conflict of Interest policy, and the Confidentiality policy, and I agree to abide by those policies.

I understand that the Employee Handbook is not a contract and does not establish terms of employment. I also understand and agree that nothing in the Employee Handbook is intended to affect the "at-will" relationship between the Aspen Institute and myself. I understand that this means that I may end my employment relationship with the Aspen Institute at any time, for any reason. I also understand that this also means that the Aspen Institute may terminate my employment at any time, for any reason, without prior notice.

I understand that no employee or agent of the Aspen Institute other than the President has the authority to enter into any employment agreement on any basis other than "at will." Any such employment agreements must be in writing and signed by the President to be effective.

I also understand that the Aspen Institute reserves the right to revise, supplement or rescind policies, procedures or benefits described in the Employee Handbook, with or without notice.

Print Name:

Signature:

Date:

Please return sign form to:

The Aspen Institute
Attn: Human Resources Department
2300 N Street, NW, Suite 700
Washington, DC 20037
hrsupport@aspeninstitute.org