POLICY MANUAL

National Association of State Veterans Homes

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Section 1 -Anti-Discrimination Policy

Equal employment opportunity is the law. In accordance with state and federal laws and executive orders, it is the policy of the National Association of State Veterans Homes (NASVH) not to discriminate on the basis of race, gender, color, national origin, religion, age, sex, certain genetic information, or disability.

1A Anti-Discrimination in Employment. The Association is an "equal opportunity employer." The Association will not discriminate and will take "affirmative action" measures to ensure against discrimination in employment, recruitment, advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment on the bases of race, creed, color, national origin, or sex. All hiring decisions will be based on characteristics related to valid job requirements and individual performance.

1B Reasonable Accommodation for Employees with Disabilities. It is the policy of the Association to provide reasonable accommodations for any employee or applicant who is a Qualified Individual with a Disability. The Association and its employees will adhere to all applicable federal, state, and local laws, regulations, and guidelines with respect to providing reasonable accommodations. The Association shall provide reasonable accommodations in a timely and cost-effective manner. An employee seeking a reasonable accommodation shall make a request, specifying the suggested accommodation, to the NASVH President. Due to the nature and complexity of laws addressing this subject, the NASVH President shall consult with the Past Presidents and 1st Vice President whenever reasonable accommodation situations arise.

1C Civil Rights Complaints by Members. Employees, contractors, and executive committee leaders shall immediately report complaints, whether written or oral and from any source, regarding discrimination or any other violation of a member's civil rights to the NASVH President. If that person is not available, or if the member feels it would be unproductive to inform that person, the member should immediately contact any person on the Executive Committee. Due to the nature and complexity of laws addressing this subject, the NASVH President shall consult with the Past Presidents and 1st Vice President.

Section 2 -Anti-Harassment Policy

The Association is committed in all areas to providing a work environment that is free from harassment. Harassment based upon an individual's sex, race, ethnicity, national origin, age, religion, or any other legally protected characteristics will not be tolerated. All employees, contractors and Executive Committee members are expected and required to abide by this policy. No person will be adversely affected in membership with the Association as a result of bringing complaints of unlawful harassment. Where appropriate, disciplinary action will be taken against any employee who violates this policy.

2A Harassment Defined.

2A1 Harassment. Harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, gender, color, religion, national origin, age, or disability or that of his or her relatives, friends, or associates, and that:

- Has the purpose or effect of creating an intimidating, hostile or offensive working environment.
- Has the purpose or effect of unreasonably interfering with an individual's work performance; or

- Otherwise adversely affects an individual's employment opportunities.
- Harassing conduct includes, but is not limited to, the following:
    - Epithets, slurs, negative stereotyping, or threatening, intimidating or hostile acts that relate to race, gender, color, religion, national origin, age or disability; and
    - Written or graphic material that denigrates or shows aversion or hostility toward an individual or group because of race, color, religion, national origin, age or disability and that is placed on walls, bulletin boards, electronic communications, or elsewhere on the Division's premises or circulated in the workplace.

2A2 Sexual Harassment. Sexual harassment is behavior of a sexual nature that is unwelcome and offensive to the person or persons it is targeted toward. Examples of harassing behavior may include unwanted physical contact, foul language of an offensive sexual nature, sexual propositions, sexual jokes or remarks, obscene gestures, and displays of pornographic or sexually explicit pictures, drawings, or caricatures. Use of the employer's computer system for the purpose of viewing, displaying, or disseminating material that is sexual in nature may also constitute harassing behavior.

2B Reporting Harassment, Investigation and Resolution

2B1 Filing a Complaint. If an employee, contractor, or member feels that he or she has been harassed on the basis of his or her sex, race, national origin, ethnic background, or any other legally protected characteristic they should immediately report the matter to the NASVH President. If that person is not available, or if the employee, contractor, or member feels it would be unproductive to inform that person, the employee, contractor, or member should immediately contact any person on the Executive Committee.

Once the matter has been reported it will be promptly investigated. Due to the nature and complexity of laws addressing this subject, the NASVH President shall consult with the Past Presidents and 1st Vice President whenever harassment situations arise.

All complaints of unlawful harassment will be handled in as discreet and confidential a manner as is possible under the circumstances.

2B2 Action and Resolution. If the investigation reveals that the complaint is valid, the Association will take prompt action designed to stop the harassment immediately and to prevent its recurrence. Any necessary corrective action will be taken where appropriate.

2B3 Retaliation. Retaliation against any complaining employee, member, contractor, witness, or anyone involved in a complaint is strictly prohibited. Employees and members should immediately report any retaliation under the complaint procedure set forth in this policy.

Section 3 -Record Retention Policy

NASVH is committed to maintaining proper records management practices that ensure compliance with applicable laws and regulations, facilitate efficient operations, and preserve the integrity of the Association's

history. This policy establishes guidelines for the retention and disposal of records and outlines the responsibilities of the Judge Advocate/Historian in maintaining a historical record of the Association per the Association's bylaws.

3A Purpose. The purpose of this policy is to outline the procedures for the retention, storage, and disposal of records maintained by NASVH in order to ensure compliance with legal requirements, while preserving the Association's historical documentation for future reference.

3B Scope. This policy applies to all records created, received, and maintained by NASVH in the course of its operations, including but not limited to administrative, financial, legal, and historical records.

3C Types of Records. NASVH records include but are not limited to:

3C1 Administrative Records. Minutes of meetings, policies, procedures, and correspondence.

3C2 Financial Records. Tax filings, invoices, receipts, financial statements, and audit reports.

3C3 Legal Records. Contracts, agreements, bylaws, intellectual property documents, and compliance records.

3C4 Historical Records. Documents, photographs, publications, and any other materials that chronicle the history and activities of the Association.

3D Record Retention Schedule. Based on standard practices for non-profits, the following table outlines the retention periods for different types of documents maintained by NASVH:

Type of Document	Minimum Retention Requirement
Accounts payable ledgers and schedules	7 years
Audit reports	Permanently
Bank reconciliations	2 years
Bank statements	3 years
Checks (for important payments and purchases)	Permanently
Contracts (expired)	7 years
Contracts (still in effect)	Contract period
Correspondence (general)	2 years
Correspondence (legal and important matters)	Permanently
Correspondence (with customers and vendors)	2 years
Employment applications	3 years
Year-end financial statements	Permanently
Insurance records, accident reports, claims, policies, etc. (active and expired)	Permanently
Internal audit reports	3 years
Invoices (to members and vendors)	7 years
Minutes, constitution and bylaws	Permanently

Payroll records and summaries	7 years
Personnel and Contractor files (terminated)	7 years
Tax returns and worksheets	Permanently

3E Role of the Judge Advocate/Historian. The Judge Advocate/Historian is responsible for compiling, recording, and maintaining the history of the Association. This includes:

- Collecting and preserving key documents, photographs, and publications that chronicle NASVH's history and achievements.
- Maintaining an organized archive of the Association's historical records, ensuring that they are protected and available for future reference.
- Working with other NASVH officers and Executive Committee to ensure that important historical moments and decisions are well-documented and accessible for future generations.

3F Record Disposal. Records that have reached the end of their retention period should be disposed of in a manner that ensures confidentiality and security. Documents containing sensitive or personal information should be shredded or otherwise destroyed to prevent unauthorized access.

3G Compliance. All members of the NASVH Executive Committee, staff, contractors, and volunteers are required to comply with this policy. Any questions or requests for clarification regarding record retention should be directed to the NASVH President, Executive Director, or the Judge Advocate/Historian.

3H Confidentiality and Security. All records must be stored securely to protect the confidentiality and integrity of the information. Digital records should be maintained on secure servers with adequate backups, while physical records should be stored in locked cabinets or offices.

Section 4 -Conflict of Interest Policy

NASVH is committed to maintaining the highest standards of integrity and ethical conduct. This policy ensures that officers, directors, employees, contractors, and individuals with decision-making authority at NASVH (collectively referred to as "NASVH Representatives") identify and address conflicts of interest to protect NASVH's integrity. It is designed to supplement, but not replace, any applicable state and federal laws governing conflicts of interest for nonprofit organizations. In the event there is an inconsistency between the requirements and procedures prescribed herein and those in any applicable state or federal law, the provisions of the applicable law shall control.

4A Conflict of Interest Defined. A conflict of interest exists when a NASVH Representative's actions, relationships, or interests compromise their ability to act in the best interests of NASVH. This includes situations where a Representative's private interests could improperly influence, or appear to influence, their duties and responsibilities.

4B Prohibited Activities. NASVH Representatives are prohibited from participating in any activity that conflicts with their duties and responsibilities to the organization. An activity is considered a conflict if the individual in execution of their NASVH duties and responsibilities:

- Has a direct or indirect financial or personal interest in the activity.
- Engages in NASVH commerce, contractual work, transactions, or other organization business for the purpose of private gain.
- Conducts NASVH business with undisclosed family members, business associates, or other private relationships where there is a potential for personal bias or diminished professional judgment.
- Incurs an obligation on NASVH of any nature that conflicts with their duties.

4C Prohibited Transactions. The following transactions are prohibited:

1. NASVH Representatives must not engage in any financial, business, or professional transaction on behalf of NASVH without written authorization from the NASVH President or designee.
2. NASVH representatives may make official purchases using organization funds only within normal procedures where approvals from the President or other authorizing person has been received.
3. NASVH Representatives must not receive any personal benefit directly or indirectly, from any contract, sale, lease, or purchase made or donation received by the organization.
4. Gifts, gratuities, or favors of economic value from individuals or entities doing business with NASVH are prohibited unless approved in writing by the NASVH President. Exceptions include nominal promotional materials such as pens, calendars, and similar items.

4D Disclosure. NASVH Representatives must disclose any activities or financial interest that may conflict with their duties, including:

- Activities that prevent or interfere with the mission of the association.
- Situations where the purpose is to influence their duties.
- Engagements that require disclosure of confidential information.

Questions concerning this policy should be directed to the President and Executive Committee.

4E Confidential Information. NASVH Representatives must not disclose confidential information obtained during the performance of their duties unless authorized or legally required.

4F Violations. Any violation of this policy is grounds for disciplinary action, up to and including termination of employment, board membership, or any other representative role with NASVH. All Representatives must act in good faith, with reasonable grounds for believing their actions are consistent with this policy. The NASVH President will review and investigate all reports of potential conflicts of interest and recommend appropriate corrective action.

Section 5 -Whistleblower Protection Policy

NASVH is committed to the highest standards of ethics and integrity in the conduct of its activities. The purpose of this policy is to encourage the reporting of unethical behavior, illegal conduct, and other violations of NASVH's code of ethics, and to provide protection for those who make such reports in good faith.

5A Reporting Responsibility. It is the responsibility of all officers, directors, Executive Committee members, contractors, members, and volunteers to report any concerns regarding unethical conduct, violations of NASVH's

code of ethics, or violations of law and regulations governing NASVH's operations. This policy is designed to encourage individuals to raise concerns internally so that NASVH can address and resolve potential issues.

5B Retaliation. NASVH strictly prohibits retaliation against anyone who, in good faith, reports concerns about unethical behavior or violations of law. Anyone who retaliates against a whistleblower is subject to disciplinary action, up to and including termination of membership in NASVH.

5C Reporting Procedure. NASVH encourages members to report any concerns to their Regional Director. If the member is not comfortable reporting to the Regional Director or is dissatisfied with the response, they are encouraged to speak with the Executive Director or another member of the Executive Committee. Complaints should then be submitted to the NASVH President, who is responsible for investigating and resolving the issue.

5D NASVH President's Responsibility. The NASVH President is responsible for ensuring all reported concerns are investigated and resolved. The President must report to the Executive Committee on all complaints and their resolutions, and at least annually to the Finance Committee on issues related to accounting or financial improprieties.

5E Accounting and Auditing Matters. Any concerns or complaints regarding corporate accounting practices, internal controls, or auditing should be immediately reported to the Finance Committee. The President will collaborate with the committee to ensure these matters are resolved appropriately.

5F Acting in Good Faith. Reports should be made in good faith, with reasonable grounds for believing that the information disclosed points to a violation. False, malicious, or knowingly untrue allegations may result in disciplinary action, including termination of membership.

5G Confidentiality. Complaints may be submitted confidentially. NASVH will maintain the confidentiality of reports to the extent possible, while ensuring a thorough investigation is conducted.

5H Handling of Reported Violations. Upon receiving a complaint, the President will acknowledge receipt and initiate an investigation. If the investigation substantiates the complaint, appropriate corrective action will be taken to resolve the issue.