



Palo Alto Veterans Institute for Research

Employee Handbook

March 2026

Contents

Welcome	5
Introduction.....	6
Important Employment Policies	8
At-Will Employment	8
Without Compensation (WOC) Appointment	8
Intergovernmental Personnel Act (IPA) Assignment	8
Equal Employment Opportunity (Anti-Discrimination)	9
Reasonable Accommodations.....	10
Anti-Harassment	10
Retaliation	12
Complaint Procedure: Discrimination, Unlawful Harassment, Retaliation	13
Training.....	14
Whistleblower Protection.....	14
Violence Free Workplace	14
Drug and Alcohol-Free Workplace.....	16
Recruitment and Hiring	19
Recruiting Policy	19
Immigration Law Applicable to All Employees	19
Concurrent VA / PAVIR / Stanford Employment	20
Employment of Relatives.....	21
Employee Referral Program	22
General Employment Information	23
Job Duties	23
Rehire/Bridge Prior Service	23
Employment Classification	23
Fair Labor Standards Act (FLSA) Status.....	24
Employment Category	24
Employment Type.....	24
Personnel Records.....	25
Personal Information.....	25
Workplace Privacy	25

Telecommuting or Remote Work	26
Open-Door Policy	27
Compliance Audits	28
Pay and Hours	29
Wage and Hour Compliance	29
Work Schedule.....	29
Punctuality and Attendance	29
Non-Exempt Positions	30
Exempt Employees	34
Payment of Wages	35
Administrative Pay Corrections	36
Expense Reimbursement.....	36
Compensation Philosophy	38
Performance Reviews	38
Salary Reviews	39
Special Contribution Awards	39
Benefits	40
Benefits Eligibility	40
Paid Time Off	40
Sick Leave.....	41
Holidays.....	44
Health Benefits	44
Additional Benefits	44
Mandated Benefits	45
Leaves of Absence	47
Family/Medical Leave and Pregnancy Disability Leave	47
Personal Leave	52
Additional Leave.....	53
Property and Information.....	63
Personal Property	63
Sponsored Research Information.....	65
Inventions.....	66
Copyrighted Materials	66

Research Results and Other Project Information	66
Computer and Internet Use	66
Computer Password Security	67
Social Media	67
Employee-Owned Devices.....	68
Parking/Off-Duty Use of Facilities	68
Values and Employee Conduct.....	69
Values	69
Confidentiality	70
Conflict of Interest/Ethics	70
Request by Third Parties for PAVIR Information	71
Business Conduct.....	71
Responsible Use of Artificial Intelligence in the Workplace.....	71
Dress Code and Grooming Standards	72
Off-Duty Conduct.....	72
Political Activity	72
Solicitation and Distribution of Literature	72
Prohibited Conduct	73
Health, Safety, and Security.....	75
Safety and Accident Prevention.....	75
Computer Workstation Ergonomics	75
Reporting Workplace Accidents and Safety Concerns	76
Smoking.....	76
Emergency Measures	77
Guests and Visitors	77
Housekeeping.....	77
Security	77
Termination.....	78
Employment Termination	78
Exit Interviews.....	78
Return of Property	78
Final Pay	78
Continuation of Health Coverage	78

Employee References	79
VA Non Profit Corporation (NPC) Non-Disclosure Agreement Confirmation.....	80
Acknowledgment of Receipt – PAVIR Employee Handbook.....	82

Welcome

It is my pleasure to welcome you to the Palo Alto Veterans Institute for Research (PAVIR). Our mission is to:

***Advance Veteran and public health
through innovative research***

PAVIR is proud to be a leading nonprofit among the research corporations formed under Public Law 100-322. Established in 1988, PAVIR operates as an independent 501(c)(3) on-site at the VA Palo Alto Health Care System (VAPAHCS) and is uniquely positioned to foster public-private partnerships that facilitate essential research for Veterans and society at large.

The team at PAVIR, including more than 250 VA Principal Investigators, embodies a shared mission to tackle some of the most pressing health challenges Veterans face. From Post Traumatic Stress Disorder (PTSD) and depression, Traumatic Brain Injury (TBI), and chronic pain to geriatric care, Women's Health, and broader public health initiatives, our work spans clinical, basic, and translational science as well as data-driven healthcare innovations. Genomic medicine is a major overarching interest in our pursuit of health improvements for Veterans that make personalized medicine a reality. Our strong affiliations with VAPAHCS and Stanford University's School of Medicine further strengthen our collective impact.

We are delighted that you have decided to join PAVIR, and we are confident that you will find PAVIR a dynamic and rewarding place to work. As an important member of our team, you will contribute to a vibrant, mission-driven community. Collaboration, excellence, and integrity guide what we do. Our success depends upon the talent, dedication, and engagement of PAVIR employees to ensure compliance, excellence, and the delivery of real-world impact to those who have served our nation.

It is a privilege to support and empower pioneering research that fuels discoveries that transform care for Veterans and benefit public health. Thank you for joining us in this vital mission.

Elaine Staats, MPH
Chief Executive Officer

Introduction

This Employee Handbook (Handbook) is designed to summarize many of PAVIR's personnel policies in effect as of the published date. It supersedes all previously issued handbooks and any inconsistent policy statements or memoranda. Written employment agreements between PAVIR and certain individuals may override some of the provisions of this Handbook, but only when signed by the CEO or Board of Directors. If terms contained in a specific employment agreement conflict with the policies and procedures contained in this Handbook, the employee shall adhere to their employment agreement.

PAVIR reserves the right to modify, revoke, suspend, terminate, or change any policy, practice, or benefit described in this Handbook at any time, with or without notice, subject to applicable law. No modification or change to this Handbook will modify the policy of at-will employment unless specifically set forth in a writing, signed by the Chief Executive Officer and the affected employee. Any written changes to this Handbook will be distributed to all employees to ensure awareness of new policies or procedures. No oral statements or representations can alter the provisions of this Handbook.

This Handbook is intended to provide general information about PAVIR's policies and practices. Except for the at-will employment relationship described below, nothing in this Handbook creates or is intended to create an express or implied contract of employment, a promise of continued employment, or a guarantee of any specific terms or conditions of employment. Nothing in this Handbook prohibits or restricts employees from exercising their rights under the National Labor Relations Act (NLRA), including rights under Section 7 of the NLRA, such as the right to self-organization, to form, join, or assist labor organizations, to bargain collectively through representatives of their own choosing, and to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection, to discuss wages or working conditions, or any other activities protected by the NLRA.

This Handbook is intended to comply with all applicable laws, including federal, California state, and local regulations. No provision of this Handbook is intended to limit, waive, or otherwise interfere with any employee rights provided by law. In any instance where laws conflict, PAVIR will comply with the law that provides the greatest protection or benefit to the employee. If any policy or provision in this Handbook is determined to be inconsistent with applicable law, such policy or provision shall be modified to conform to the minimum requirements of the law or shall not be enforced to the extent it is inconsistent.

Because PAVIR is headquartered in California, many of the policies outlined herein reflect compliance with California state law, which may differ from the laws of other states where employees may live or work. Employees who reside or perform work outside of California should refer to the state-specific supplement provided for their work location, which contains additional or differing policies applicable under local laws. In the event of a conflict between this Handbook and an applicable state supplement, the provisions offering greater protection or benefit to the employee will generally apply, consistent with governing law. Nothing in this Handbook is intended to provide greater rights or benefits than those required by applicable law.

If you have any questions about which policies apply to you or how to interpret any part of this Handbook or your applicable state supplement, please contact the Human Resources department for clarification.

It is important that all employees read, understand, and follow the provisions of this Handbook. If you have any questions concerning your eligibility for a particular benefit or whether a policy or practice applies to you, please contact Human Resources (HR).

Important Employment Policies

At-Will Employment

PAVIR maintains an at-will employment relationship with all employees. Employment at-will means that both the employee and PAVIR may terminate the employment relationship at any time, with or without cause, and with or without advance notice. Similarly, an employee's status (for example, position, duties, salary, promotions, demotions, etc.) may be changed at-will, with or without cause and with or without notice at any time. Nothing in this Handbook or in any document or statement shall limit the right to terminate employment at-will or limit PAVIR's right to transfer, demote, suspend, administer discipline, and change the terms and conditions of employment at its sole discretion.

Employment may be terminated at any time, with or without cause and with or without notice by either PAVIR or the employee. No manager, supervisor, or employee of PAVIR has authority to enter into an agreement for employment for any specified period of time or to make any agreement contrary to this at-will policy. Any agreement that alters the "at-will" nature of employment must be set forth in writing signed by the Chief Executive Officer and affected employee.

Without Compensation (WOC) Appointment

Certain PAVIR positions require a Without Compensation (WOC) appointment with the U.S. Department of Veterans Affairs (VA) in order to perform authorized research or other approved activities within VA facilities or systems.

A WOC appointment is a federal administrative designation that permits access to VA facilities, patients, systems, or research resources. A WOC appointment does not create an employment relationship with the VA. Individuals holding WOC appointments remain employees of PAVIR at all times and are subject to PAVIR's employment policies and procedures. The VA does not determine PAVIR employees' compensation, discipline, performance evaluations, or continued employment with PAVIR.

WOC appointments may be considered to be federal employees and subject to VA and applicable federal requirements, including suitability determinations, background investigations, and compliance with applicable VA policies while performing authorized activities within VA facilities or systems.

Continued employment in positions requiring a WOC appointment is contingent upon maintaining an active and approved WOC status. If a WOC appointment is denied, revoked, or not renewed, the employee may be unable to continue in the position and employment with PAVIR may be terminated, subject to applicable law.

Intergovernmental Personnel Act (IPA) Assignment

Certain positions may involve assignments under the Intergovernmental Personnel Act (IPA), which permits an employee to be temporarily assigned to work with the VA while remaining employed by PAVIR, unless otherwise specified in a written agreement.

Employees on IPA assignments remain employees of PAVIR and are subject to PAVIR's employment policies and procedures, except where a written IPA agreement expressly provides otherwise. During an IPA assignment, employees must also comply with applicable federal requirements governing their assigned duties. An IPA assignment does not create an employment relationship with the VA or entitle the employee to VA employment benefits.

Federal Tort Claims Act (FTCA) Coverage

Individuals holding VA WOC appointments or detailed to an IPA may be eligible for coverage under the Federal Tort Claims Act (FTCA) for certain negligent acts or omissions committed within the scope of their authorized VA-related duties. FTCA coverage is limited to activities specifically approved under the WOC appointment or IPA detail and performed in accordance with VA requirements.

FTCA coverage does not apply to all activities performed for PAVIR and does not replace or expand PAVIR's own insurance coverage or the employee's employment responsibilities.

Equal Employment Opportunity (Anti-Discrimination)

PAVIR is committed to providing equal employment opportunities to all employees and applicants. PAVIR's policy prohibits discrimination based on race (inclusive of traits associated with race, including but not limited to hair texture and protective hairstyles; protective hairstyles include, but are not limited to, such hairstyles as braids, locs, and twists), religious creed (which includes religious dress and grooming practices), color, national origin (which includes, but is not limited to, national origin groups and aspects of national origin, such as height, weight, accent, or language proficiency), ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex (which includes pregnancy, childbirth, breastfeeding, and related medical conditions), gender, gender identity, gender expression, age, sexual orientation, reproductive health decision making, military or veteran status (including state and federal active and reserve members as well as those ordered to duty or training), immigration/citizenship status (which includes undocumented individuals and victims of human trafficking) or related protected activities, protected medical leaves, domestic violence victim status, political affiliation, or any other consideration made unlawful by federal, state, or local laws, ordinances, or regulations. These categories include a perception that the individual has any of these characteristics or is associated with a person who has (or is perceived to have) any of these characteristics. Discrimination is further prohibited not just on the basis of individual protected traits, but also on the basis of the intersectionality (or combination) of two or more protected characteristics. PAVIR personnel-related decisions including, but not limited to, hiring, recruiting, firing, promotion, demotion, training, compensation, qualifications/job requirements will be based solely on legitimate business-related reasons such as merit, education, job performance, job experience, and other job-specific criteria.

PAVIR is committed to compliance with all applicable anti-discrimination laws. This commitment applies to all persons involved in PAVIR operations and prohibits unlawful discrimination by any employee of PAVIR, regardless of position or status, including supervisors and co-workers. This policy protects all employees of PAVIR as well as interns, and potential employees (applicants).

Any employee or applicant who believes they have been subjected to discrimination or retaliation in violation of this policy is encouraged to report the concern immediately in accordance with the Complaint

Procedure described below. PAVIR prohibits retaliation against any individual who makes a good faith complaint or participates in an investigation. If PAVIR determines that unlawful discrimination has occurred, effective remedial action will be taken commensurate with the severity of the offense. Appropriate action will also be taken to deter any future discrimination. PAVIR will not retaliate against an employee for filing a complaint and will not knowingly permit retaliation by any other employee, including supervisors or management.

Reasonable Accommodations

The Americans with Disabilities Act (ADA) and the California Fair Employment and Housing Act (FEHA) and other applicable laws require employers to make a good faith effort to provide reasonable accommodations for qualified individuals with disabilities, unless doing so would cause undue hardship. A reasonable accommodation may include changes in the work environment, work schedule, or the way a job is performed to enable a person with a disability to enjoy equal employment opportunities.

To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, PAVIR will make a good faith effort to provide reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee, , to perform the essential functions of the position unless undue hardship would result.

Any applicant or employee who believes they require an accommodation to perform the essential functions of the job should email hr@pavir.org, specifying what accommodation they need to perform the essential functions of the job and discuss the need for an accommodation. PAVIR will analyze the situation, engage in an interactive process with the applicant or employee, and respond to the individual's request. To determine the existence of a disability, or to determine the feasibility or effectiveness of an accommodation, PAVIR may request information or opinions, to the extent permitted by applicable law. The employee or applicant is responsible for providing such information.

PAVIR will not discriminate against any individual in regard to compensation or any term or condition of employment because of a conflict with an individual's religious beliefs or observance and any employment requirement. Any applicant or employee who requires accommodation of a religious belief or practice (including but not limited to religious dress and grooming practices, such as religious clothing or hairstyles) should also email hr@pavir.org to discuss the need for an accommodation. PAVIR will explore potential reasonable accommodations and will make a good faith effort to implement reasonable accommodations unless an undue hardship would result.

Pregnancy and lactation accommodations may also be requested. Please refer to the Lactation and Pregnancy Disability Leave policies set forth herein for further information.

Anti-Harassment

PAVIR is committed to providing a work environment free of unlawful harassment in order to support and conduct research and education advancing Veteran and public health.

PAVIR prohibits harassment based on any characteristic protected by applicable federal, state, or local law. Protected characteristics include all of those listed in the Equal Employment Opportunity (Anti-Discrimination) section of this Handbook, including perceived characteristics, association with individuals

who have (or are perceived to have) protected characteristics, and harassment based on the intersection of two or more protected characteristics. All such conduct violates PAVIR policy.

PAVIR's anti-harassment policy protects employees, interns, and applicants for employment. This policy applies to all persons involved in PAVIR's operations and prohibits unlawful harassment by any PAVIR employee, regardless of position or status, including supervisors and co-workers. PAVIR will take appropriate corrective action to prevent and address unlawful harassment by non-employees, including collaborators, vendors, customers, contractors, and others who have workplace contact with our employees.

Unlawful harassment includes unwelcome verbal, visual, or physical conduct creating an intimidating, offensive, or hostile work environment that interferes with work performance, and will not be tolerated. A hostile environment occurs when anyone creates intimidating or offensive working conditions, either on or off the work site. Prohibited harassment and disrespectful or unprofessional conduct includes, but is not limited to, the following behavior pertaining to any of the above protected characteristic(s):

- **Verbal/Written** - conduct such as unwanted sexual advances including flirting, sexually suggestive innuendos, conversations regarding sexual activities, and sexual invitations or comments, racial slurs or epithets, sexist or misogynistic comments, ethnic insults or jokes, religious aspersions or mockery, disability insults or ridicule, homophobic epithets or slurs, transphobic comments or derision, derogatory comments regarding gender, gender identity or gender expression, disparaging remarks regarding military or veteran status, threats of deportation against applicants and employees and family members of applicants and employees, derogatory comments about immigration status or mockery of an accent of language or its speakers, negative remarks regarding marital status, pejorative or incendiary ethnophaulisms (i.e. racial or ethnic slurs), or any other belittling, negative or derogatory comments regarding any protected characteristic(s). This includes comments or conduct that consistently target one gender, even if the content is not sexual.
- **Visual** - Displays such as derogatory and/or sexually oriented posters, photography, cartoons, drawings, gestures, text messages, social media activity, instant messages, e-mails, letters, pictures, or gifts.
- **Physical** - Conduct including assault, unwanted touching, intentionally blocking normal movement, or interfering with work because of sex, race or any other protected basis.
- **Sexual** - Threats and demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss, and offers of employment benefits in return for sexual favors.
- **Electronic** - Communication via electronic media of any type that includes any conduct that is prohibited by local, state and/or federal law, or by PAVIR.

Sexually harassing conduct does not need to be motivated by sexual desire and may include situations that began s reciprocal relationships but later ceased to be reciprocal.

PAVIR's expectations apply to all phases of employment, including, but not limited to, recruiting, testing, hiring, promotion, demotion, transfer, layoff, termination, rates of pay, benefits, and selection for training. In addition, this policy extends to conduct with a connection to an employee's work, even when the conduct takes place away from PAVIR's premises, such as a PAVIR social function, or social media activity (depending on the circumstances).

If an employee believes that they have been the subject of harassment or other prohibited conduct, they should follow the complaint procedure outlined below. This involves bringing the complaint to their supervisor and email hr@pavir.org as soon as possible after the incident. Supervisors who receive a complaint must report any complaints of misconduct to hr@pavir.org so PAVIR can take action to address the complaint. The employee will be asked to provide details of the incident or incidents, names of individuals involved, and names of any witnesses. It is best to communicate the complaint in writing, but this is not mandatory. Supervisors will refer all complaints involving harassment or other prohibited conduct to hr@pavir.org. Complaints will be communicated to other parties within the VA or Stanford as necessary. To the greatest extent possible, HR will keep complaints confidential, while allowing the investigation to proceed (meaning information may be revealed on a “need to know” basis). All complaints will be investigated in a fair, timely, and thorough manner.

If PAVIR determines that harassment or other prohibited conduct has occurred, effective remedial action will be taken in accordance with the circumstances involved. Any PAVIR employee determined by PAVIR to be responsible for harassment or other prohibited conduct will be subject to appropriate disciplinary action up to and including termination. A PAVIR representative will generally advise appropriate person(s) of the findings of the investigation, but due to confidentiality and privacy considerations, certain elements of the investigation, including disciplinary measures taken against the accused (if any), will not be shared.

PAVIR encourages all employees to immediately report any incidents of harassment or other prohibited conduct forbidden by this policy so complaints can be promptly resolved.

Retaliation

PAVIR strictly prohibits retaliation against any employee, intern, or potential employee (applicant) for engaging in a protected activity (i.e., opposing practices or conduct the employee reasonably believes to be unlawful, or for participating in an investigation or proceeding that is lawfully protected, reporting or assisting in reporting suspected violations of this policy, refusing to report to, or leaving, the workplace place during an emergency condition (as defined by law) because the employee reasonably believes that the workplace or worksite is unsafe, or engaging in any other activity protected by applicable law). Any adverse action taken against an employee due to such opposition or participation is unlawful and will not be tolerated. As used in this Employee Handbook, “adverse employment action” means conduct or an action that materially affects the terms and conditions of the employee’s employment status or is reasonably likely to deter the employee from engaging in further protected activity.

PAVIR will not retaliate against an employee for filing a complaint and will not tolerate or permit retaliation by management, employees, or co-workers. Any form of retaliation, including derogatory comments, against people who make harassment complaints, against witnesses or any other employees who are involved in complaints, is prohibited. PAVIR will strictly enforce this and will treat retaliatory actions as violations subject to disciplinary measures, up to and including termination of any employee who retaliates against another employee for engaging in any of these protected activities.

If you believe you have been subjected to unlawful retaliation, please follow the complaint procedure outlined below.

Complaint Procedure: Discrimination, Unlawful Harassment, Retaliation

All employees who believe they have been subjected to or who witness discrimination, unlawful harassment, and/or retaliation are strongly encouraged to promptly report the alleged violation(s) in accordance with the procedures set forth below. Complaints may be submitted, preferably in writing, by email to your supervisor, to hr@pavir.org, or through any of the reporting channels described below. If these individuals are not available, or if you believe that one of these individuals has engaged in inappropriate behavior in violation of these policies, submit a complaint to any other member of the PAVIR Leadership team by emailing LeadershipTeam@pavir.org or any member of the PAVIR HR department as soon as possible. Select the individual with whom you feel the most comfortable discussing your complaint.

Supervisors **must** report any and all conduct of which they are made aware that violates, or may violate, policies regarding unlawful discrimination, harassment, or retaliation to hr@pavir.org. Supervisors who fail to report alleged violations may be subject to disciplinary action, up to and including termination.

All complaints submitted pursuant to this policy should preferably be made by email, but they may be made verbally. Your complaint should be specific and should include the names of the individuals involved, the names of any witnesses, and supporting documentation. Employees may choose to submit their complaints anonymously.

PAVIR encourages all employees to immediately report any incidents of unlawful discrimination, harassment, and/or retaliation so that complaints can be quickly and fairly resolved. PAVIR will maintain confidentiality to the extent reasonably possible, consistent with the need to conduct a thorough investigation and comply with applicable law.

Upon notice of conduct requiring an investigation, PAVIR will promptly undertake an effective, thorough, and objective investigation to look into the facts and circumstances of the alleged violation as appropriate. PAVIR's investigation methods may vary depending on the nature of the complaint, the allegations, the witnesses, and other factors.

PAVIR may investigate conduct in the absence of a formal complaint if there is reason to believe that an individual has engaged in conduct that violates PAVIR policies or applicable law. Further, PAVIR may continue its investigation even if the original complainant withdraws their complaint during the investigation.

All employees are required to fully cooperate with the investigation, which includes, but is not limited to, providing all pertinent information in a truthful manner, submitting pertinent documents in their possession, not interfering with the investigation in any manner, and maintaining an appropriate level of discretion regarding the investigation. Failure to do so may result in disciplinary action, up to and including termination.

If PAVIR determines that unlawful conduct or a violation of applicable policies has occurred, appropriate remedial measures will be taken in accordance with the circumstances involved. Any PAVIR employee determined by PAVIR to be responsible for unlawful discrimination, harassment, and/or retaliation will be subject to appropriate disciplinary action, up to and including termination. Appropriate action will also be taken to deter future conduct. In addition, the offending individual may be legally liable for their conduct,

depending on the circumstances. Due to privacy protections, PAVIR cannot fully disclose its entire decision regarding corrective action to the complainant.

Retaliation is strictly prohibited against any individual who makes a good faith complaint or participates in an investigation, regardless of the outcome. Please refer to the Retaliation Policy above for further information.

Employees who believe that they have been unlawfully discriminated against, harassed, or retaliated against may also file a complaint with the local office of the California Civil Rights Department (“CRD”) or the United States Equal Employment Opportunity Commission (“EEOC”). The CRD and the California Civil Rights Council (“CRC”) as well as the EEOC can also order an employer to hire, reinstate, or promote a victim of discrimination, harassment, and/or retaliation or make other changes in PAVIR policies. The address and phone number of the local CRD and EEOC offices can be found in the government sections of your local telephone directory or online.

Training

PAVIR complies with all applicable California training requirements and requires employees to complete any mandatory training applicable to their position, including harassment prevention training where required by law. Failure to complete required training within the designated timeframes may result in disciplinary action, up to and including termination, subject to applicable law.

Whistleblower Protection

PAVIR prohibits retaliation against any applicant or employee who refuses to participate in an activity that would result in a violation of, or noncompliance with, local, state, or federal law or regulation, or who discloses information to a government or law enforcement agency when the individual has reasonable cause to believe the information discloses a violation of, or noncompliance with, a local, state or federal statute or regulation. PAVIR also prohibits discrimination and retaliation against an applicant or employee based on whistleblowing activity concerning a former employer. Employees who have concerns about practices they believe may be unlawful or violate PAVIR policy are encouraged to report those concerns to their supervisor, Human Resources, or another appropriate reporting channel. Individuals who make a good faith report of suspected unlawful or improper conduct will be protected from retaliation. Any employee who believes they have been subjected to retaliation may also report the matter to the California Attorney General’s Whistleblower Hotline at 1-800-952-5225 or other appropriate government agency.

Violence Free Workplace

PAVIR is committed to maintaining a workplace free from violence and maintains a Workplace Violence Prevention Plan (WVPP) in accordance with California law. The WVPP is available at www.pavir.org. Workplace violence includes any act of violence or threat of violence that occurs in the workplace. For PAVIR employees, this includes work performed on VA property and other locations where employees are engaged in work-related duties. This definition does not apply to employees’ regular remote work locations, such as their homes, except as required by applicable law. Workplace violence includes, but is not limited to, the following:

The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury. An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.

The following four workplace violence types:

- **Type 1 violence** - Workplace violence committed by a person who has no legitimate business at the workplace and includes violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.
- **Type 2 violence** - Workplace violence directed at employees by customers, clients, or visitors.
- **Type 3 violence** - Workplace violence against an employee by a present or former employee, supervisor, or manager.
- **Type 4 violence** - Workplace violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee.

Workplace violence does not include self-defense or defense of others.

PAVIR has procedures in place to alert employees of workplace violence emergencies. If there is immediate danger, employees should report the incident directly by calling:

- **Palo Alto:** Call ext. 65500. This extension is labeled on all phones and on the cards that hang behind PIV badges.
- **Menlo Park:** Call 9-911 first and follow up with VA police at ext. 56-65891, if possible, to notify them of 911 call and request escort for external responders.

PAVIR is committed to providing a workplace that is free from acts of violence or threats of violence. In keeping with this commitment, and in addition to the WVPP referenced above, PAVIR has established a strict policy that prohibits any employee from threatening or committing any act of violence in the workplace, while on duty, while on PAVIR-related business, or while operating any vehicle or equipment owned or leased by PAVIR. This policy applies to all employees.

Workplace violence includes, but is not limited to, threats of any kind; threatening, physically aggressive, or violent behavior, such as intimidation or attempts to instill fear in others; other behavior that suggests a propensity toward violence, including belligerent speech, excessive arguing or swearing, sabotage, threats of sabotage of PAVIR property; defacing PAVIR property or causing physical damage to the facilities; and bringing weapons or firearms of any kind on PAVIR premises or while conducting PAVIR business on or off PAVIR property.

In order to achieve our goal of providing a workplace that is secure and free from violence, PAVIR must enlist the support of all employees. Compliance with this policy and PAVIR's commitment to a zero-tolerance policy with respect to workplace violence is every employee's responsibility. Compliance with this anti-violence policy is a condition of employment. Employees who violate any of its terms, who engage in or contribute to violent behavior, or who threaten others with violence may be subject to disciplinary action, up to and including immediate termination.

Employees are required to report any incident involving a threat of violence or act of violence immediately to their supervisor or the Chief Executive Officer, or the phone numbers above. All reports will be investigated by PAVIR, and appropriate corrective action will be taken.

If an employee becomes aware of an imminent act of violence, a threat of imminent violence, or actual violence, emergency assistance must be sought immediately. In such situations, the employee should contact the law enforcement authorities by dialing 911. Immediately after contacting the law enforcement authorities, the employee must report the incident to the Chief Executive Officer. Employees should immediately inform their supervisor or Chief Executive Officer about any workplace security hazards. If these individuals are not available, the employee should immediately inform any other supervisor so that appropriate action can be taken.

In certain circumstances, PAVIR may seek a workplace violence restraining order on behalf of one or more employees in furtherance of its commitment to providing a workplace that is free from acts of violence, threats of violence, and harassment. Furthermore, employees should notify Human Resources or the Chief Executive Officer if any restraining order is in effect or if a potentially violent non-work-related situation exists that could result in violence in the workplace.

Any person who violates this policy on PAVIR property may be removed from the premises as quickly and safely as possible, at PAVIR's discretion, and may be required to remain off PAVIR premises pending the outcome of an investigation of the incident.

All reports of workplace violence will be taken seriously and will be investigated promptly and thoroughly. In appropriate circumstances, PAVIR will inform the reporting individual of the results of the investigation. To the extent feasible, PAVIR will maintain the confidentiality of the reporting employee. However, PAVIR may need to disclose information in appropriate circumstances (for example, in order to protect individual safety).

If PAVIR determines that workplace violence has occurred, PAVIR will take appropriate corrective action and may impose disciplinary action, up to and including termination.

There will be no retaliation against any employee who brings a complaint in good faith under this policy or who honestly assists in investigating such a complaint, even if the investigation produces insufficient evidence that there has been a violation, or if the charges cannot be proven. However, disciplinary action may be taken against employees who, in bad faith, make false or frivolous accusations.

Drug and Alcohol-Free Workplace

PAVIR is committed to maintaining a safe, healthy, and productive work environment free from the effects of alcohol, illegal drugs, and controlled substances. The use of these substances on the job can negatively impact an employee's work performance, safety, and health. Additionally, the use or possession of these substances on the job constitutes a potential danger to the welfare and safety of other employees and poses a risk to the safety and welfare of other employees and can lead to property loss or damage.

To promote a drug-free workplace, employees are required to report to work in a condition that allows them to perform their duties safely and effectively, whether working remotely or on-site.

Nothing in this policy is intended to prohibit the lawful use of marijuana while off-duty and away from the workplace, as protected under applicable California law. However, employees are prohibited from being under the influence of marijuana during work hours or while performing work-related duties.

Prohibited Conduct

For purposes of this policy, “illegal drugs” includes, but is not limited to, substances that are prohibited by law (such as cocaine, heroin, etc.), controlled substances, and prescription drugs (if they are not prescribed for the person using them and/or not being used as prescribed). “Marijuana” includes cannabis and cannabis-derived products in any form, including products containing tetrahydrocannabinol (THC), whether smoked, vaped, ingested (including edibles), or otherwise consumed. “Under the influence” means that the employee is impaired in a manner that affects their ability to perform their job safely and effectively, including impairment caused by alcohol, marijuana (including THC-containing products), illegal drugs, or prescription medication.

The following rules and standards of conduct apply to all employees during work hours (including meals and rest periods), and when working remotely. Violations of this policy include:

- Possession, use, or being under the influence of illegal drugs, controlled substances, or marijuana (including THC-containing products) while on the job
- Marijuana remains prohibited under federal law and on VAPAHCS property, regardless of state law
- Driving a vehicle for work purposes while under the influence of alcohol or controlled substances
- Distribution, sale/offer for sale, or purchase of illegal drugs or controlled substances while on the job
- Failing to keep all prescribed medicines in their original containers

Violation of these rules and standards of conduct will not be tolerated. PAVIR may also bring the matter to appropriate law enforcement authorities.

This policy will not be construed to prohibit the use of alcohol at social or business functions sponsored by PAVIR where alcohol is served. However, employees must remember their obligation to conduct themselves appropriately at all times while at PAVIR-sponsored functions or while representing PAVIR.

Prescription and Over-the-Counter Drugs

The use of prescription and over-the-counter drugs may also affect an employee’s ability to perform their job. Employees using such medications that may impair the employee’s ability to work safely must notify their supervisor before starting or resuming work.

PAVIR supports the rights of qualified individuals with disabilities and will make good faith efforts to provide reasonable accommodations in accordance with applicable law. The lawful use of prescribed medication for a disability will not, by itself, violate this policy. However, employees must still be able to perform the essential functions of their position safely and effectively, with or without reasonable accommodation.

Remote Work Considerations

Employees working remotely are expected to comply with all aspects of this policy. This includes refraining from the use of alcohol, illegal drugs, or controlled substances during work hours. Employees working remotely are fully subject to and must strictly comply with all aspects of this policy at all times during work hours, and remote work does not lessen or modify any obligations under this policy. Supervisors are

expected to remain attentive to signs of impairment or policy violations and must promptly address any concerns regarding compliance, including in remote work settings.

Support for Employees

PAVIR encourages employees with alcohol or drug dependencies to seek treatment and rehabilitation. Employees seeking assistance should request treatment or rehabilitation leave. Employees should be aware that participation in a rehabilitation program will not necessarily prevent the imposition of disciplinary action, including termination, for violation of this policy. Employees who undergo voluntary counseling or treatment and who continue to work, if any, must meet all established standards of conduct and job performance

Violations

Compliance with this policy is a condition of employment. Failure or refusal to comply with lawful inspection or testing requirements, where permitted by applicable law, may result in disciplinary action, up to and including termination. Violations of this policy may result in disciplinary action, up to and including termination, subject to applicable law.

Because the use, sale, purchase, possession, or furnishing of an illegally obtained substance is a violation of the law, PAVIR may report such illegal drug activities to an appropriate law enforcement agency. Employees are required to notify PAVIR of any criminal drug statute conviction for a violation occurring in the workplace within five (5) days after the conviction, as required by applicable law. Failure to do so may result in discipline, up to and including termination.

Recruitment and Hiring

Recruiting Policy

PAVIR seeks to recruit and select qualified individuals whose skills, abilities, and experience align with the requirements of the position. Recruitment, selection, and placement decisions are based on job-related criteria and applicable legal requirements to ensure fair and equitable practices.

Internal Recruitment

When positions become available, qualified current employees in good standing are encouraged to apply. Posting a position does not guarantee promotion or transfer. The hiring manager will determine which candidates to interview based on job-related criteria.

External Recruitment

PAVIR seeks to reach a broad and diverse pool of candidates and advertises job openings through appropriate channels consistent with equal employment opportunity requirements.

Selection Process

The selection process is based on job-related criteria, including skills, abilities, and experience. PAVIR uses a structured interview process to ensure consistency and fairness. PAVIR does not use automated decision systems, artificial intelligence, or algorithmic decision-making tools to screen, rank, or select applicants for employment. All recruitment and hiring decisions are made by human decision-makers based on job-related criteria and in compliance with applicable law.

Pay Transparency

PAVIR complies with applicable California pay transparency laws.

- The pay scale for a position will be provided to an applicant or current employee upon reasonable request.
- Salary or hourly wage ranges PAVIR reasonably expects to pay for the position will be included in job postings for positions that may be filled in California, whether performed in person or remotely.
- PAVIR maintains records of job titles and wage rate histories for each employee for the duration of employment and for the period required by applicable law.

Immigration Law Applicable to All Employees

PAVIR complies with the Immigration Reform and Control Act of 1986 (IRCA) and employs only individuals who are authorized to work in the United States. All employees must complete the Form I-9 employment eligibility verification process as required by federal law and present acceptable documentation verifying identity and work authorization within the timeframes required by law. Failure to provide required documentation within the legally mandated timeframes may result in termination of employment.

Employees may be required to re-verify their employment authorization as required by federal law if their authorization documentation expires. Failure to provide updated documentation within the required

timeframes may result in termination of employment. PAVIR participates in E-Verify as required by applicable law or contract. Completion of the E-Verify process may be a condition of employment where required.

PAVIR does not routinely sponsor permanent residency (“green card”) applications. Requests for visa sponsorship or other work authorization support will be evaluated on a case-by-case basis in accordance with business needs and applicable law.

PAVIR will provide employees with notices of their rights under applicable immigration and workplace protection laws as required by California law, including information regarding interactions with immigration enforcement agencies in the workplace. Employees also have the right to designate an emergency contact to be notified if they are arrested or detained at the worksite. Commencing February 1, 2026, PAVIR provides employees on an annual basis, and upon hire, a notice of their rights including, among other things, their constitutional rights when interacting with an immigration agency in the workplace. Employees also have the right to designate an emergency contact to be notified should an employee be arrested or detained at the worksite.

Concurrent VA / PAVIR / Stanford Employment

PAVIR recognizes that certain PAVIR employees may hold appointments or compensated positions with more than one institution, including the U.S. Department of Veterans Affairs (VA), Stanford University, or other entities. Because many PAVIR activities are federally funded and/or conducted in collaboration with the VA, concurrent employment arrangements are subject to strict compliance requirements.

Concurrent compensated employment is permitted only when all applicable legal, regulatory, and institutional requirements are satisfied, including federal appropriations law, effort certification requirements, sponsored research conditions, and conflict of interest standards.

Concurrent employment is allowed only when all of the following conditions are met:

- **No Overlap of Compensated Time.** An employee may not receive compensation from more than one employer for the same period of time. Work performed for PAVIR must be entirely separate from work performed for any other employer, including the VA or Stanford.
- **Accurate and Separate Time and Effort Reporting.** Employees must maintain complete, truthful, and contemporaneous timekeeping records for each employer in accordance with applicable policies. Where required, effort certifications must accurately reflect the percentage of time devoted to each funding source and employer.
- **Compliance With Federal Funding and Compensation Rules.** Concurrent employment must comply with all applicable federal grant requirements, including limitations on total effort, compensation caps, and allocability of costs under federal cost principles. Employees are responsible for ensuring that total compensated effort across institutions does not exceed 100% and remains consistent with documented commitments.
- **No Conflict of Interest or Commitment.** The arrangement must not create an actual or apparent conflict of interest or conflict of commitment and must not interfere with the employee’s ability to fulfill assigned duties for PAVIR.
- **Advance Written Disclosure and Approval.** All concurrent employment arrangements must be fully disclosed in advance and approved in writing by PAVIR’s Chief Executive Officer or

designee. Where applicable, approval must also be obtained from the other employing institution prior to the commencement of the arrangement.

For employees holding a VA Without Compensation (WOC) appointment or serving under an Intergovernmental Personnel Act (IPA) Mobility Agreement, additional federal requirements may apply. Such individuals remain subject to applicable federal statutes, VA regulations, and ethical obligations while performing authorized VA duties. Concurrent employment arrangements must be structured to comply with those authorities and may not circumvent federal restrictions on compensation or effort.

Approval of concurrent employment does not create a joint employment relationship between PAVIR and any other entity. Each employer independently determines supervision, compensation, benefits, and other terms and conditions of employment.

Failure to comply with dual employment requirements, including inaccurate timekeeping and reporting, overlapping compensated time, or misrepresentation of effort, may result in disciplinary action up to and including termination, and may require corrective action under applicable federal, state, or institutional requirements.

Employees must contact Human Resources at hr@pavir.org before initiating, modifying, or accepting any concurrent employment arrangement.

Employment of Relatives

PAVIR permits the employment of relatives provided that such employment does not create an actual or potential conflict of interest or an inappropriate reporting relationship. Relatives may not be employed in positions where one directly or indirectly supervises, evaluates, influences employment decisions regarding, or exercises control over the terms and conditions of employment of the other.

For purposes of this policy, “relatives” include spouses, domestic partners, children, siblings, parents, grandparents, nieces, nephews, in-laws, step-relatives, and individuals with comparable close personal relationships.

Employees are required to disclose any familial or comparable close personal relationship that could create a conflict under this policy. If a conflict arises, PAVIR will determine appropriate corrective action, which may include reassignment where feasible, or separation from employment. Failure to disclose a covered relationship may result in disciplinary action, subject to applicable law.

If two current employees become spouses or registered domestic partners during their employment, they may continue working in their respective positions provided they do not have a direct or indirect supervisory relationship and are not placed in a situation that creates, or appears to create, a conflict of interest. Employees must promptly notify Human Resources of such a change in relationship status so that PAVIR can evaluate whether any actual or potential conflict exists and determine whether any adjustments to reporting relationships, job responsibilities, or separation from employment are necessary.

Employee Referral Program

PAVIR encourages employees to refer qualified candidates for open positions. Referral awards may be offered for eligible referrals in accordance with this policy. Submission of a referral does not guarantee that the referred candidate will be interviewed or hired.

Eligibility for a referral award is limited to employees who are not involved in the hiring decision for the position at issue. Employees in Human Resources, members of the Leadership Team, and supervisors or managers who directly or indirectly influence the hiring decision for the position are not eligible for a referral award.

To qualify for a referral award, the referred candidate must be hired and remain actively employed with PAVIR for a minimum of thirty (30) days, and the referring employee must remain actively employed at the time the award is paid. Referral awards are discretionary, are subject to applicable payroll tax withholding, and the Employee Referral Program may be modified or discontinued at any time.

Referral awards will be administered and paid in compliance with applicable federal, state, and local wage and hour laws. Where required by law, referral awards will be treated as non-discretionary compensation and included in the regular rate of pay for purposes of calculating overtime, paid sick leave, and other premium payments for non-exempt employees.

General Employment Information

Job Duties

At the start of employment, or upon transfer to a different position, an employee's supervisor is expected to review the employee's primary job responsibilities and performance expectations with the employee. Job descriptions are intended to provide a general overview of duties and are not intended to be exhaustive.

PAVIR reserves the right to modify job responsibilities, reporting relationships, work assignments, job titles, or departmental assignments as business needs require, subject to applicable law.

Employees may also be assigned additional duties, projects, or responsibilities consistent with their role and organizational needs. Employees are expected to perform assigned duties in a cooperative and professional manner.

Rehire/Bridge Prior Service

PAVIR may, in limited circumstances and with written approval, recognize prior paid service with PAVIR, VA-affiliated nonprofit research corporations, Stanford University, the U.S. Department of Veterans Affairs (VA), or other specifically approved entities. Recognition of prior service is not automatic and will be evaluated on a case-by-case basis in accordance with business needs and applicable law.

If prior service is recognized, it will be applied only for the specific purpose identified at the time of approval and will not create or restore seniority, benefits eligibility, or other employment rights except as expressly stated or required by law.

Any break in service will be considered in determining eligibility for benefits or other employment-related matters, consistent with applicable law and the governing benefit plan documents.

Employment Classification

Employment classifications are based on the nature of the work performed, the number of hours regularly scheduled to work, and the anticipated duration of employment. At the time of hire, PAVIR Human Resources will inform employees of their employment classification. Employment classifications may be modified during employment as business needs require, and any such change will be communicated in writing. An employee will not change from one status to any other status or classification simply because of the number of hours that the employee is scheduled to work or the length of time spent as an employee. Classification status may affect eligibility for benefits.

All employment with PAVIR is for an indefinite duration. Nothing in this section alters the at-will nature of employment. Employment may be terminated at any time, with or without cause and with or without advance notice, subject to applicable law.

Fair Labor Standards Act (FLSA) Status

Jobs at PAVIR are classified as either exempt or non-exempt in accordance with federal and California wage and hour laws. Classification is based on job duties and salary requirements as defined by applicable law.

- **Exempt Employees** – Positions classified as exempt meet the legal requirements for exemption from overtime under applicable law. Exempt employees are generally paid on a salary basis and are not eligible for overtime compensation, subject to applicable law. Common exemption categories include executive, administrative, professional, outside sales, and certain computer-related positions.
- **Non-Exempt Employees** – Positions classified as non-exempt do not meet the criteria for exemption from overtime requirements. Non-exempt employees are eligible for overtime pay as required by law and must accurately record all hours worked. Non-exempt employees are required to take meal and rest periods in accordance with applicable law and the policies described in this Handbook.

Employees who have questions about their classification should contact Human Resources.

Employment Category

Employment categories are based on an employee's regularly scheduled work hours.

- **Full-Time** – Employees regularly scheduled to work 30 hours or more per week are generally classified as full-time. Eligibility for benefits is determined in accordance with the applicable benefit plan documents and policies and applicable law.
- **Part-Time** – Employees regularly scheduled to work fewer than 30 hours per week are generally classified as part-time. Part-time employees receive legally mandated benefits and may be eligible for certain additional benefits as outlined in the applicable benefit plan documents and applicable law.

Nothing in this section guarantees eligibility for any particular benefit. Benefit eligibility and coverage are governed exclusively by the terms of the applicable benefit plans.

Employment Type

- **Regular** – Regular employees are hired to work on an ongoing basis and may be scheduled on either a full-time or part-time basis.
- **Temporary** – Temporary employees are hired for limited-duration assignments based on business needs. The anticipated duration of a temporary assignment is generally six months or less and may vary and may be extended or shortened at PAVIR's discretion, subject to applicable law. Temporary employment does not guarantee continued employment or conversion to regular status. An employee will not change from one status to any other status or classification simply because of the number of hours that the employee is scheduled to work or the length of time spent as an employee. The status of a temporary employee may change only if the employee is notified of the change in status, in writing, by Human Resources.

Benefit eligibility for temporary employees, if any, is governed by the applicable benefit plan documents and policies.

Personnel Records

In accordance with California law, employees have the right to inspect and receive a copy of personnel records maintained by PAVIR that relate to the employee's performance. PAVIR maintains personnel records primarily in electronic format.

Certain documents may be excluded or redacted as permitted by law, including but not limited to records relating to the investigation of a possible criminal offense, letters of reference, confidential third-party materials, and other documents not subject to inspection under applicable law.

Requests to inspect or receive copies of personnel records must be submitted in writing to Human Resources at hr@pavir.org. PAVIR will provide access to records in electronic form, or in another reasonable format if required by law, within the timeframes required by applicable law.

Employees may designate a representative in writing to inspect or receive copies of records on their behalf. PAVIR may take reasonable steps to verify the identity and authorization of any designated representative before releasing records.

If physical copies are requested, PAVIR may charge the actual cost of reproduction as permitted by law. Disclosure of personnel information to third parties will be limited to those authorized in writing by the employee or as otherwise required or permitted by law.

Personal Information

PAVIR maintains employee records as required by law. Employees are responsible for promptly notifying PAVIR of any changes to their name, addresses (including mailing and email), contact information, or other personal information relevant to employment.

PAVIR maintains employee demographic and personal information in accordance with applicable privacy laws and business needs to the extent permitted by law. Access to personnel and benefits-related information is limited to individuals with a legitimate business need to know and is safeguarded through appropriate administrative and technical measures.

To ensure accurate payroll processing and benefits administration, employees are responsible for updating personal information, including contact information, tax withholding elections, emergency contacts, licensure status (if applicable), and beneficiary designations, through the designated employee self-service system at www.workforcenow.adp.com when changes occur.

Workplace Privacy

PAVIR may use video surveillance in common work areas for legitimate business purposes, including safety and security. Surveillance will not occur in restrooms, locker rooms, changing areas, or other locations where employees have a reasonable expectation of privacy. Video surveillance does not include audio recording.

PAVIR may access work areas, business equipment, electronic systems, and communications used for work purposes, including assigned computers and work email accounts, to the extent permitted by applicable law. Employees do not have a reasonable expectation of privacy in PAVIR-owned property, systems, or communications, subject to applicable law.

Telecommuting or Remote Work

PAVIR may permit telecommuting or remote work arrangements where individual, job, and supervisory circumstances are appropriate. Telecommuting or remote work is a voluntary work alternative that may be suitable for some positions and employees but not all. Approval of telecommuting or remote work is within PAVIR's sole discretion and is not a job entitlement. Telecommuting or remote work arrangements may be modified, suspended, or discontinued by PAVIR at any time, with or without advance notice or cause, subject to applicable law.

For purposes of this policy, telecommuting or remote work means working from home or another approved location within the United States for all or part of an employee's regular workweek. Telecommuting or remote work from a location outside of the United States is prohibited. Incidental travel to attend a professional conference, meeting, or other approved business event does not constitute telecommuting or remote work for purposes of this policy. Employees may not perform routine or scheduled remote work from outside of the United States unless expressly authorized in advance by PAVIR in writing, and permitted by applicable law.

California employees who seek to telecommute from outside of California must provide Human Resources at least two (2) months' advance written notice. PAVIR will evaluate and, where necessary, establish appropriate payroll, tax, and legal registrations before work may be performed in another state. Telecommuting or remote work may not begin in a new state until all required approvals and registrations are completed. Delays may occur if sufficient advance notice is not provided. PAVIR reserves the right to deny any employee's request to telecommute from outside of California.

All routine or ongoing telecommuting or remote work arrangements must be documented in a written agreement approved by the employee's supervisor and PAVIR. Telecommuting or remote work arrangements do not alter the at-will nature of the employment relationship.

Telecommuting or remote work is not a substitute for appropriate childcare or dependent care. While schedules may be modified where appropriate, employees are expected to maintain a professional work environment and remain focused on job responsibilities during working hours.

Wage and Hour Compliance

Non-exempt employees who telecommute must accurately and contemporaneously record all hours worked, including start and end times of work periods and start and end times of meal periods, in accordance with PAVIR's timekeeping policies. Advance written approval is required before working overtime. All meal period, rest period, and recordkeeping requirements continue to apply to non-exempt employees who telecommute.

Workplace Safety and Workers' Compensation

Employees are responsible for maintaining a safe and suitable work environment at their remote work location. Work-related injuries sustained in the course and scope of employment while telecommuting or

remote work must be reported immediately in accordance with PAVIR's injury reporting procedures. Workers' compensation coverage applies only to injuries arising out of and in the course of employment. Unless otherwise required by law, PAVIR is not responsible for injuries to third parties at an employee's remote work location.

Equipment and Expenses

PAVIR will determine, on a case-by-case basis, the appropriate equipment and supplies necessary for an employee to perform job duties. Equipment provided by PAVIR remains PAVIR property and must be used for business purposes only. Employees may be required to acknowledge receipt of PAVIR equipment and to return all equipment and records upon request, during a leave of absence, or upon separation from employment.

Unless otherwise required by law, PAVIR is not responsible for costs associated with establishing or maintaining a home office, including remodeling, furniture, insurance, or other household expenses. All reasonable and necessary business expenses will be reimbursed in accordance with PAVIR's reimbursement policies and applicable law.

Protection of Confidential Information

Employees must safeguard confidential, proprietary, research, and VA-related information while working remotely. Official VA research records or institutional documentation may not be removed from the workplace unless expressly authorized. Employees must comply with all data security, confidentiality, and information protection policies.

Compliance With Laws and Insurance Obligations

Unless otherwise required by law, employees are responsible for complying with applicable tax, zoning, licensing, and insurance requirements related to working from a home location. Telecommuting or remote work does not alter employees' obligation to comply with all federal, state, and local laws.

Employees should contact Human Resources for additional guidance regarding eligibility, approval requirements, and expectations for remote work.

Open-Door Policy

PAVIR encourages employees to raise suggestions, questions, or concerns regarding their job duties, working conditions, or workplace issues. Employees are encouraged, but not required, to first discuss concerns with their immediate supervisor when appropriate.

If an employee is not comfortable raising a concern with their supervisor, or if the issue is not resolved, the employee may contact Human Resources at hr@pavir.org. Employees may also raise concerns directly with PAVIR leadership.

This Open-Door Policy does not replace or limit the separate Complaint Procedure for concerns involving discrimination, harassment, retaliation, or other unlawful conduct.

Concerns involving suspected fraud or conflicts of interest must be reported to the Chief Executive Officer or through appropriate reporting channels.

While PAVIR cannot guarantee that every concern will be resolved to an employee's satisfaction, PAVIR is committed to reviewing concerns raised in good faith and prohibits retaliation against any employee who raises a concern in good faith.

Compliance Audits

Government agencies and other authorized entities may conduct audits, inspections, or reviews of PAVIR operations to verify compliance with applicable laws, regulations, or contractual requirements. Such audits may occur with or without advance notice.

Employees are expected to cooperate with authorized auditors and to respond truthfully to inquiries. If an employee is unsure how to respond to a question or believes additional information is required, the employee may refer the auditor to their supervisor or to PAVIR administration for assistance. Employees may also notify the PAVIR Administrative Office at LeadershipTeam@pavir.org when an audit or inspection occurs.

Nothing in this policy is intended to restrict employees from communicating directly with government agencies as permitted by law.

Pay and Hours

Wage and Hour Compliance

PAVIR is committed to full compliance with federal, state, and local wage and hour laws. Supervisors and managers are expected to understand and comply with all applicable requirements relating to timekeeping, overtime, meal periods, rest periods, and premium payments.

Supervisors are strictly prohibited from encouraging off-the-clock work, altering time records without authorization and verification, or interfering in any way with an employee's right to take legally required meal or rest periods.

Employees who have concerns regarding wage and hour compliance should report the concern to Human Resources. PAVIR will review concerns promptly and will not tolerate retaliation against any employee who raises a good faith concern.

Work Schedule

Most PAVIR employees work traditional business hours, Pacific Time, Monday through Friday. Work schedules are assigned by supervisors based on operational needs and may vary by position. Employees are expected to adhere to their assigned schedules and to observe meal and rest periods (for non-exempt employees) in accordance with applicable law. This expectation applies to employees working on-site and remotely.

The standard workweek begins at 12:01 a.m. Sunday and ends at midnight on Saturday. The workday begins at 12:01 a.m. and ends at midnight.

Work schedules, work locations, and staffing assignments may be modified as business needs require, subject to applicable law. Where practicable, supervisors will provide advance notice of schedule changes. For non-exempt employees, overtime work must be authorized in advance.

Non-exempt employees will be compensated for overtime in accordance with applicable law. Exempt employees are expected to fulfill the responsibilities of their positions, which may include working additional hours as necessary to meet business needs. Exempt employees are not entitled to overtime.

Punctuality and Attendance

Employees are expected to report to work as scheduled and to be prepared to perform their duties during their assigned work hours, except during authorized meal and rest periods or when engaged in approved business activities. Unscheduled and unexcused absences, tardiness, or early departures may disrupt operations and should be avoided.

Employees who are unable to report to work as scheduled should notify their supervisor as soon as practicable and, when possible, before the start of their scheduled shift. Employees should provide sufficient information to allow the supervisor to understand the anticipated duration of the absence or tardiness.

Excessive unexcused absenteeism or tardiness may result in corrective action, subject to applicable law. An employee who fails to report to work and does not provide notice to their supervisor for three consecutive

scheduled workdays may be deemed to have voluntarily resigned, subject to applicable law and any legally protected leave rights.

Absences for reasons protected by federal, state, or local law will not be treated as violations of this policy.

Non-Exempt Positions

Employees classified in non-exempt positions are paid for all hours worked and for paid holidays or paid leave for which they are eligible under applicable policies. If an employee starts working late or stops working early, they will only be paid for the time actually worked and not the whole day. Non-exempt employees must accurately record all hours and clock in and out whenever they begin, cease, or resume working during the course of a workday. Employees will be paid for all hours worked, whether or not properly recorded. However, failure to comply with timekeeping procedures or working unauthorized overtime may result in disciplinary action.

Timekeeping Requirements

Employees are responsible for recording and certifying their attendance, including sick and vacation leave for each pay period via the electronic timecard process on ADP WorkforceNow unless there is an approved mechanism for paper submission.

For all other leaves, please email payroll@pavir.org for additional information. Submitting accurate timecards in a timely fashion is a key requirement to ensuring that employees receive correct payment and that grant funds and other funding sources are charged correctly. PAVIR cannot overstate the importance of timely and accurate timecard submission by all employees. Non-exempt employees must record their meal break(s), any overtime hours, and time off work (for example, vacation hours, sick hours, etc.) for each pay period via the electronic timecard and are requested to enter this information on ADP WorkforceNow on a daily basis.

Any errors on a timecard should be corrected and reported immediately to the assigned supervisor. Any changes on the timecard must be reviewed and approved by the assigned supervisor. Submitting inaccurate timecards is not permissible.

To ensure compliance with all applicable laws, non-exempt employees must accurately record all hours worked using ADP WorkforceNow. This means they must clock in and out whenever they begin, cease, or resume working during the course of a workday. While employees need not clock out and in during rest periods, they must clock out and in during meal periods. Under no circumstances may one employee clock in or out for another employee. Non-exempt employees are prohibited from engaging in the following conduct:

- Working “off the clock.”
- Recording hours inaccurately (i.e., recording hours that were not actually worked or failing to record hours that were worked).
- Recording hours worked on behalf of another employee.
- Failing to record all hours worked.
- Falsification of any time record.

Violations of this policy may result in disciplinary action, up to and including termination.

Paid Rest Periods

All non-exempt employees are entitled to paid 15-minute rest period(s) during their workday. Employees are excused from all duties and are free to leave the premises during their rest periods but are expected to return to work promptly at the end of any rest period.

Rest periods are counted as hours worked, and thus, employees are not required to record rest periods on their timecard. Rest periods may not be combined with or added to unpaid meal breaks, nor may they be used to start work 15 minutes late or leave 15 minutes early.

Employees will be authorized and permitted one 15-minute rest period for every four hours worked (or major fraction thereof, which is defined as any amount of time over two hours). Employees are not eligible for a rest period if the total daily work time is less than three and one half hours.

Employees are authorized and permitted to take all required rest periods free from work duties and free from any interference, discouragement, or retaliation. Supervisors are strictly prohibited from impeding or discouraging employees from taking required rest periods.

If a required rest period is not provided in accordance with applicable law, the employee must immediately notify their supervisor or Human Resources so that the issue can be addressed and any required premium pay can be provided.

PAVIR prohibits retaliation against any employee who raises a concern regarding meal or rest periods.

If an employee works from three and one-half to six hours a day, the employee will be entitled to one paid 15-minute rest period. If an employee works more than six hours and up to 10 hours a day, the employee will be entitled to two paid 15-minute rest periods. If the employee works more than 10 hours and up to 14 hours, the employee will be entitled to three paid 15-minute rest periods.

Unpaid Meal Breaks

All non-exempt employees will be provided with an uninterrupted, unpaid meal period of at least 30 minutes each day they work 5 hours or more. The employee will be provided with a reasonable opportunity to take this meal break and will be relieved of all work duty. During the meal break, the employee is free to leave the premises. Employees are expected to return to work promptly at the end of any meal break.

A meal break will be provided before the end of the employee's fifth hour of work. For example, if an employee begins work at 8:00 a.m., they must start their meal break by 12:59 p.m., which is before the end of their fifth hour of work.

If an employee's total work schedule for the day is more than five hours per day but no more than six hours, the employee may choose to waive the meal break. This cannot be done without the mutual written consent of the employee and the employee's supervisor. PAVIR offers written Meal Period Waiver Agreements that govern an employee's entire employment, which are voluntary and may be revoked at any time, to document the employee's waiver of first and second meal periods as well as waivers that may be used for a more limited time period. If the employee wishes to waive their meal break, the employee must complete a waiver form, which can be obtained by emailing payroll@pavir.org. If the employee's total work schedule exceeds six hours, the meal break cannot be waived.

A second uninterrupted, unpaid meal break of at least 30 minutes is required if an employee's work schedule for the day exceeds 10 hours. If the work schedule exceeds 10 hours, the employee must take a second meal

break no later than the end of the employee's 10th hour of work. For example, if an employee begins work at 8:00 a.m., they must start their second meal break by 5:59 p.m. An employee may waive their right to a second meal period for a work period as long as the employee does not work more than 12 hours and did not waive their first meal period for that work period. Please email hr@pavir.org for additional information if this applies to your working environment.

To summarize, employees are eligible for the following number of meal periods:

Length of Work Period in Hours	# of Meal Periods	Explanation
0 to ≤ 5	0	An employee whose work period is less than 5 hours is not entitled to a meal period.
> 5 to ≤ 10	1	An employee whose work period is 5 hours or more up to and including 10 hours is eligible to take a 30-minute uninterrupted unpaid meal period, unless the employee's work period is 6 or fewer hours and voluntarily waives their first meal period.
> 10	2	An employee whose work period is 10 hours or more is eligible to take a second uninterrupted unpaid 30-minute meal period, unless the employee's work period is 12 or fewer hours, did not waive their first meal period, and voluntarily waives their second meal period.

Employees must take their meal periods according to the following schedule:

Which Meal Period	When
First Meal Period	An employee's first unpaid meal period must begin within 5 hours of starting work for that work period (in other words, by the end of the fifth hour of work or 5 hours and 0 minutes on the clock). By way of example, if an employee clocks in at 8:00 a.m., then the employee must clock out and start their meal period before 1:00 p.m.
Second Meal Period	An employee's second unpaid meal period must begin within 10 hours of starting work for that work period (in other words, by the end of the tenth hour of work or 10 hours and 0 minutes on the clock). By way of example, if an employee clocks in at 8:00 a.m., then the employee must clock out and start their second meal period before 6:00 p.m.

Employees must record the start and end of their meal break(s) on their timecard. All work time must be accurately reported on the timecard.

During meal periods, employees are absolutely prohibited from performing work of any kind or any amount. Employees are excused from all duties and are free to leave the premises. Employees must record the exact start and stop times of each meal period through PAVIR's timekeeping system. Employees may not join together required meal periods to take a longer break.

Failure to comply with PAVIR's policy regarding meal and/or rest periods can lead to discipline, up to and including termination.

Meal and Rest Period Reporting and Premium Pay

Employees who miss, are unable to take, or experience a late, short, or interrupted meal or rest period must promptly notify their supervisor or Human Resources. Notification may be made through the timekeeping system, by email, or by other established reporting procedures.

If PAVIR does not provide an opportunity for a compliant meal or rest period in accordance with applicable law, the employee will receive one additional hour of pay at the employee's regular rate of pay for each workday in which an opportunity for a compliant meal and/or rest period was not provided, as required by law. Employees are expected to accurately report missed, late, short, or interrupted meal or rest periods so that any required premium pay can be processed.

Supervisors are responsible for facilitating meal and rest periods in a fair and lawful manner. Supervisors may not discourage, pressure, or coerce employees to skip, delay, shorten, or interrupt required meal or rest periods.

Employees who believe they have been pressured or prevented from taking a compliant meal or rest period should immediately notify Human Resources.

Failure to comply with PAVIR's meal and rest period policy may result in disciplinary action, up to and including termination.

Mandatory Meetings/Training

PAVIR will compensate non-exempt employees for attendance at meetings, lectures, or training programs in accordance with applicable law.

- Attendance is mandatory or is held during regular working hours;
- The meeting, lecture, or training is directly related to the employee's job;
- Productive work is performed while attending; or
- The employee who is required to attend such meetings, lectures, or training programs is notified of the necessity for such attendance by their supervisor

Extra training or coursework offered as a bonus or perk, which is optional and completely voluntary, will generally not be paid, unless required by law.

Non-exempt employees will be compensated for travel time in accordance with applicable law. Please email payroll@pavir.org in advance of any work-related travel to request detailed information applicable to your specific circumstances and obtain the forms to document travel and meeting/training time appropriately.

Calculating Sick, Vacation, and Holiday Hours for Eligible Non-Exempt Work Schedules

Sick hours, vacation hours and holiday hours will be calculated as follows for employees who work more than 30 hours a week and are classified in regular, non-exempt positions:

- **For five day/week, 8 hour/day schedules:** If an employee is absent for a full day, accumulated sick or accrued vacation hours will be deducted in 8 hour increments. For less than full day

absences, sick and vacation hours may be taken in 15 minute increments. Holiday hours will be paid in 8 hour increments.

- **For five day/week schedules greater than 30 hours but less than 40 hours a week:** When an employee is scheduled to work on a day that falls on a holiday, the employee will be paid for the number of hours that they are scheduled to work. For less than full day absences, sick and vacation hours may be taken in 15 minute increments

Overtime for Non-Exempt

Employees in non-exempt positions may be required to work overtime as necessary. Only actual hours worked in a given workday or workweek will be considered for calculating overtime. Overtime work should be authorized in advance by the assigned supervisor. However, all overtime hours worked will be paid in accordance with applicable law. Overtime must be recorded on ADP WorkforceNow to reflect actual hours worked.

PAVIR provides compensation for all overtime hours worked by non-exempt employees in accordance with state and federal law as follows:

- All hours worked in excess of eight hours in one workday or 40 hours in one workweek will be treated as overtime
- Compensation for hours worked in excess of 40 in a workweek, in excess of eight and up to and including 12 in a workday, and for the first eight hours worked on the seventh consecutive day of work in a workweek shall be paid at one and one-half times the employee's regular rate of pay. The "regular rate of pay" is calculated in accordance with applicable law and may include certain nondiscretionary bonuses, incentive compensation, and other forms of remuneration. The regular rate of pay may differ from the employee's base or stated hourly rate.
- Compensation for hours worked in excess of 12 in one workday and in excess of eight on the seventh consecutive workday in a workweek shall be paid at double the regular rate of pay.

Exempt Employees

Timekeeping Requirements

Exempt employees are not required to record partial-day absences of less than a full day for salary deduction purposes. However, exempt employees must comply with applicable leave reporting procedures for purposes of benefits tracking and grant documentation. Attendance information becomes part of PAVIR records, and these records are used to document effort, so it is critical that accurate information is submitted. Submitting accurate timecards in a timely fashion is a key requirement to ensuring that employees receive correct payment and that grant funds and other funding sources are charged correctly. Timely and accurate submission of required attendance information is essential for payroll accuracy and grant compliance. Failure to follow timekeeping procedures may result in corrective action.

Deductions for Exempt Employees

Employees who are in positions which are classified as "exempt" regularly receive a predetermined amount of compensation each pay period. This may also include vacation, sick, and holiday pay. Exempt employees will receive their full salary for any workweek in which they perform work, subject to the permissible deductions outlined below and in accordance with applicable law. Exempt employees are not required to

be paid for any workweek in which no work is performed, subject to applicable law and PAVIR leave policies.

No deductions may be made from an employee's salary for time when work is not available, provided the employee is ready, willing, and able to work. Deductions from pay for exempt employees are permissible when any of the following apply:

- The employee is absent from work for personal reasons other than sickness or disability and is not eligible to be covered by accrued paid leave
- The employee is absent due to sickness or disability if the deduction is made in accordance with a bona fide plan, policy, or practice of providing full compensation for salary lost due to illness and the employee has exhausted their leave under this policy
- The employee works less than a full week during the initial or final week of employment
- The employee is absent for one or more full days for disciplinary reasons imposed in good faith for certain types of violations of workplace conduct rules, in accordance with applicable law.

PAVIR may deduct from available accrued leave balances for partial-day absences in accordance with applicable law and PAVIR benefit policies. It is PAVIR policy to comply with these salary basis requirements. PAVIR prohibits improper deductions from the salaries of exempt employees, and PAVIR does not allow deductions which violate federal or state law. If an improper deduction is identified, PAVIR will promptly reimburse the employee and take appropriate steps to ensure future compliance.

If an employee believes an improper deduction from their salary has been made, the employee should immediately report this information to their direct supervisor or to the HR department at hr@pavir.org. Reports of improper deductions will be reviewed promptly, and the employee will be promptly reimbursed if it is determined that an improper deduction has occurred.

Compensatory Time

Despite careful planning, changing conditions may require an exempt employee to work long hours, including a weekend or holiday to meet a schedule. Exempt employees are compensated on a salary basis and are not eligible for overtime compensation under applicable law. The responsibilities of exempt positions may require working additional hours as necessary to fulfill job duties.

Payment of Wages

PAVIR pays on a semi-monthly basis. The first pay period of the month begins on the 1st of the month, ends on the 15th day of the month, and is paid on the 22nd of the month. The second pay period of the month begins on the 16th of the month, ends on the last day of the month, and is paid on the 7th day of the following month. If a regular payday falls on a weekend or holiday, employees will be paid on the last workday prior to the weekend or holiday. All wage payments are made in accordance with applicable federal and California law.

Deductions from employees' pay can be voluntary or involuntary. Voluntary deductions include health insurance, 401(k) deferrals, and other elected benefits. Involuntary deductions include items such as state and federal taxes, State Disability Insurance, child support, garnishments, etc.

Deductions from wages may be made as authorized by law or by the employee in writing. PAVIR offers direct deposit of wages. Participation in direct deposit is voluntary, and employees may elect or discontinue

direct deposit in accordance with payroll procedures. Employees should review their wage statements promptly and notify Human Resources or Payroll of any discrepancies.

PAVIR does not permit advances against paychecks or against unaccrued vacation hours or unaccrued sick leave hours unless approved in writing by the CEO. In addition, PAVIR does not allow for the “cash out” of accrued but unused vacation or sick leave hours except that accrued but unused vacation will be paid upon separation of employment in accordance with applicable law.

Administrative Pay Corrections

PAVIR is committed to paying employees accurately and in accordance with applicable law. If an employee believes there is an error in their pay, they should promptly notify the Payroll Department or Human Resources so that the matter can be reviewed and corrected as appropriate. Any confirmed underpayment will be corrected as soon as practicable. In the event of an overpayment, PAVIR will notify the employee and arrange for repayment in accordance with applicable law.

Expense Reimbursement

In accordance with applicable laws, PAVIR will reimburse employees for all necessary and reasonable expenditures or losses incurred in direct consequence of the discharge of their job duties. Employees must promptly notify their supervisor or Human Resources of any such expenses and provide appropriate documentation so that reimbursement can be processed.

Mileage

Employees who use their personal vehicle in the course and scope of employment will be reimbursed for reasonable and necessary mileage expenses incurred in direct consequence of their job duties.

Reimbursement will be made at the prevailing federal mileage rate, plus applicable tolls and reasonable parking expenses, in accordance with PAVIR’s Travel Policy.

Employees must submit required documentation, including:

- Date of travel
- Business purpose
- Origin and destination
- Total miles driven
- A PDF or screenshot from a commonly used internet mapping source (such as Google Maps, MapQuest, or similar) showing the route and mileage calculation.
- Required receipts, if applicable
- Mileage between an employee’s residence and their primary work location is considered normal commuting time and is generally not reimbursable.

If an employee travels from their residence to an alternate work location, reimbursement will be limited to the mileage in excess of the employee’s normal commute to their primary work location.

If an employee’s designated primary work location is their residence pursuant to an approved telecommuting agreement, reimbursable mileage will be calculated based on the distance between the residence and the alternate business location.

PAVIR will reimburse all reasonable and necessary business-related mileage expenses submitted in accordance with this policy.

Mobile Phone and Internet Allowance

If an employee's job duties require the business use of a personal mobile phone and/or home internet service, PAVIR will reimburse the employee for reasonable and necessary expenses incurred in direct consequence of the discharge of their duties, in accordance with applicable laws.

To facilitate reimbursement, employees may request a monthly allowance in accordance with PAVIR's Electronic Devices/Services Policy.

- The allowance is \$50 per month for mobile phone service.
- The allowance is \$50 per month for home internet service.
- The maximum total allowance is \$100 per month per employee.

The allowance:

- Must be requested using the Mobile Phone / Internet Allowance Request form.
- Must be signed by both the employee and the supervisor/manager.
- Must specify the start date (and end date, if applicable).
- Must identify the PAVIR account to be charged.
- Is considered taxable income and will be processed through payroll.

The supervisor/manager must certify that the employee's job duties require the use of the employee's personal mobile phone and/or internet service for business purposes.

If an employee believes the allowance does not reasonably cover actual business-related expenses, the employee must notify Human Resources and provide documentation supporting the request for an increased allowance, for review. PAVIR will review such requests and may adjust reimbursement as appropriate to ensure compliance with applicable law.

PAVIR may periodically review eligibility for the allowance. If business needs no longer exist, the allowance will be discontinued.

Other Business Expenses

Employees are expected to obtain prior supervisory approval before incurring business expenses whenever practicable. If an employee incurs reasonable and necessary expenses on behalf of PAVIR, the employee should promptly submit required documentation, including itemized receipts and a description of the business purpose.

Reimbursement requests must be submitted in accordance with PAVIR's Travel Policy timeframes.

PAVIR will reimburse employees for all reasonable expenditures necessarily incurred in the discharge of their job duties.

Employees are encouraged to report expenses promptly so that reimbursement can be processed accurately and efficiently. If any employee believes that the reimbursement amount provided by PAVIR is insufficient to reimburse for all reasonable expenses necessarily incurred in the discharge of their duties on behalf of PAVIR, the employee must immediately report this expense issue to the employee's supervisor and Human

Resources. Employees will be required to submit documentation (e.g. a copy of an invoice/bill and an explanation of the business use) to support any request for additional reimbursement.

Compensation Philosophy

PAVIR's compensation philosophy is to attract, motivate, and retain talented employees by offering competitive compensation and recognizing individual performance through established review processes and discretionary awards. PAVIR's compensation and benefits program is designed to be competitive with the relevant external market, fair in comparison to similar positions in the organization, and flexible to meet the needs of our diverse community.

PAVIR's compensation and benefits data is evaluated annually and utilizes relevant benchmark data from comparable organizations and labor markets.

All compensation decisions are made based solely on legitimate business-related reasons such as merit, education, job performance, job experience, and other job-specific criteria without regard to race, religious creed (which includes religious dress and grooming practices), color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex (which includes pregnancy, childbirth, breastfeeding, and related medical conditions), gender, gender identity, gender expression, age (40 and over), sexual orientation, military or veteran status, or any other consideration made unlawful by federal, state or local laws, ordinances, or regulations (See Anti-Discrimination Policy for a full list of protected characteristics). PAVIR is committed to complying with all applicable pay equity and pay transparency laws.

Performance Reviews

Eligible employees may receive periodic performance reviews conducted by their supervisor, typically on an annual basis. The standard performance review period is one calendar year. The frequency of performance evaluations may vary depending upon length of service, job position, past performance, changes in job duties, or recurring performance concerns.

The performance review process provides supervisors and their employees the opportunity to review expectations, provide feedback on job performance, foster employee development, and support employee development and performance improvement. Employees and supervisors are strongly encouraged to talk about their job performance and expectations on a frequent, informal basis.

Performance evaluations may review factors such as the quality and quantity of the work an employee performs, their knowledge of the job, their initiative, innovation, process improvement and their ability to work effectively with others. The performance reviews are intended to make employees aware of their progress, areas of strength and areas for improvement, and objectives or goals for future work performance. PAVIR recommends that employees regularly review PAVIR's core values and the process through which results can be obtained, as well as additional, specific research or administrative performance parameters to guide the performance review.

A supervisor always has the option to conduct a formal or informal off-cycle performance review.

After the review, employees will be asked to acknowledge that the performance review has been presented and discussed between the employee and the supervisor, and that the employee is aware of its contents.

Employees may contest any part of their performance review by addressing their comments separately. This process does not guarantee any changes will be made to the original performance rating. However, the employee's comments will be noted in their personnel file.

PAVIR's provision of performance evaluations does not alter the at-will employment relationship. Nothing in this policy shall limit the right to terminate employment at-will or limit PAVIR's right to transfer, demote, suspend, administer discipline, and change the terms and conditions of employment consistent with applicable law. Failure to evaluate the employee will not prevent PAVIR from transferring, demoting, disciplining, or terminating the employment of an employee. Employment remains at-will and may be terminated at any time, with or without cause and with or without advance notice, subject to applicable law.

Salary Reviews

The salary review process may consider performance review results when determining base pay adjustments. Supervisors may recommend merit-based pay adjustments based on performance, budget considerations, and other legitimate business factors. PAVIR does not provide automatic across-the-board cost-of-living increases.

Favorable performance evaluations do not guarantee increases in salary or promotions. Any decision to award a salary adjustment is discretionary and may depend on performance, budgetary considerations, organizational needs, and other legitimate business factors.

Salary adjustments, if approved, typically take effect with the pay period that begins March 1; however, timing may vary based on business needs.

Special Contribution Awards

PAVIR may grant Special Contribution Awards to recognize exceptional contributions that are above and beyond normal job responsibilities. Awards may be considered for significant achievements, including work on special projects or performance of duties substantially outside an employee's regular role.

Special Contribution Awards are discretionary, are not guaranteed, and may not be awarded in lieu of regular compensation review processes. Requests must be initiated by the employee's supervisor and are subject to review and approval by the appropriate internal departments.

A Special Contribution Award may not exceed \$5,000. Awards are taxable compensation, and employees are responsible for any applicable tax withholdings.

Benefits

Benefits Eligibility

Employees are eligible for benefits as shown in the table below. Benefit eligibility is governed by the applicable plan documents and insurance contracts, which control in the event of any inconsistency with this handbook. PAVIR reserves the right to modify, amend, or terminate benefit plans at any time, subject to applicable law.

	Vacation, & Holiday Pay	Paid Sick Leave	Medical / Dental / Vision Insurance	Flexible Spending Accounts	Life, AD&D, LTD Insurance	Commuter Benefits	401(K) Retirement Plan	401(K) Profit Sharing (After 1 Year Service)	Employee Assistance
Full-time Regular (30+ hours per week)	☑	☑	☑	☑	☑	☑	☑	☑	☑
Full-time Temporary (30+ hours per week, Fewer than 6 months)		☑	☑	☑	☑	☑	☑	☑	☑
Part-time Regular (Less than 30 hours per week)		☑				☑	☑	☑	☑
Part-time Temporary (Less than 30 hours per week, fewer than 6 months)		☑				☑	☑	☑	☑

Paid Time Off

Vacation

Only full-time regular employees who are regularly scheduled to work 30 or more hours per week are eligible to accrue vacation under this policy.

Eligible employees accrue vacation based on paid hours in each pay period, subject to a maximum accrual cap of 240 hours. Accrual rates are determined by length of service and, where applicable, approved creditable prior service. Accrual rates are based on hours paid per pay period as follows:

Years of Service	Accrual Rate
0-3 years	5% of paid hours
Over 3 – 15 years	7.5% of paid hours
Over 15 years	10% of paid hours

For purposes of determining accrued vacation, exempt employees are presumed to work 40 hours per week. Certain positions, including Directors, Executives, and qualifying Principal Investigators (PIs), may be eligible for alternative accrual rates consistent with organizational policy and documented approval criteria.

Vacation accrues while an employee is in active pay status. Accrual does not occur during unpaid leaves of absence unless otherwise required by law. Vacation accrues during paid leaves, including vacation and sick leave, in accordance with payroll practices.

Vacation accrual is subject to a maximum balance of 240 hours. Once the cap is reached, no additional vacation will accrue until the employee's accrued balance falls below the cap. No vacation time will be earned for the period in which the employee's vacation time was at the maximum.

Employees are encouraged to use vacation during the year it is accrued. Vacation scheduling is subject to supervisory approval and operational needs. Vacation requests may be deferred or denied based on business requirements.

Non-exempt employees may use accrued vacation in increments of 15 minutes consistent with payroll system capabilities. Vacation is paid at the employee's current base hourly rate (or salary equivalent). Vacation hours do not count as hours worked for purposes of calculating overtime.

Exempt employees may be required to use accrued vacation for full-day absences in accordance with applicable law and PAVIR policy. PAVIR policy requires exempt employees vacation time will be deducted in four-hour increments.

Accrued but unused vacation will be paid upon separation of employment at the employee's final rate of pay, in accordance with California law.

PAVIR reserves the right to modify this policy in accordance with applicable law.

Sick Leave

PAVIR provides paid sick leave in accordance with the California Healthy Workplaces, Healthy Families Act and other applicable state or local laws.

All employees who work for PAVIR in California for 30 or more days within a year are eligible for paid sick leave.

Where federal, state, or local law provides greater paid sick leave benefits, PAVIR will comply with the law that provides the greater benefit to the employee.

Accrual Method (Full-Time Regular Employees)

Full-time regular employees accrue paid sick leave at a rate of 5% of paid hours (i.e., four hours of sick leave for every 80 hours worked), subject to a maximum accrual cap of 500 hours. Employees who accrue more than 500 hours will not accrue any additional paid sick leave until their balance falls below the 500-hour cap. Accrual occurs during paid status and does not occur during unpaid leave unless required by law. Accrued but unused sick leave carries over from year to year, subject to the accrual cap.

For non-exempt employees, accrual is based on actual hours worked. For exempt employees, accrual is based on a 40-hour workweek or the employee's normal workweek if fewer than 40 hours.

Frontload Method (Part-Time and Temporary Employees)

Eligible part-time and temporary employees receive 40 hours (or five days) of paid sick leave (whichever is greater) at the beginning of each calendar year. These employees do not accrue paid sick leave under the accrual method described above.

Unused frontloaded sick leave carries over from year to year, subject to a maximum cap of 80 hours (or 10 days) whichever is greater, consistent with applicable California law.

For employees hired during the calendar year, they will receive five days or forty hours of paid sick leave, whichever is more, on their first day of employment for use during the remainder of the employee's first calendar year of employment.

Reinstatement

Employees rehired within 12 months of separation will have previously accrued and unused sick leave reinstated, as required by law. Employees returning to PAVIR more than 12 months after separation of employment will be treated as a new employee for purposes of paid sick leave.

Permissible Uses

Paid sick leave may be used for the diagnosis, care, or treatment of an existing health condition of, or preventive care for, the employee or the employee's family member.

For purposes of this policy:

- Family member includes a child, parent, spouse, domestic partner, grandparent, grandchild, sibling, or designated person, as defined by applicable law.
- Child includes a biological, foster, adopted, or step-child; a child of a domestic partner; a legal ward; or a child to whom the employee stands in loco parentis.
- Parent includes a biological, foster, or adoptive parent; a step-parent; or a legal guardian of the employee or the employee's spouse or domestic partner.
- Spouse means a legal spouse under applicable law.
- Designated person means a person identified by the employee at the time the employee requests paid sick leave. Only one designated person may be identified per 12-month period.

Paid sick leave may also be used to take time off from work to serve on a jury, appear in court in response to a subpoena or court order, or for reasons related to being a victim of, or having a family member be a victim of, certain crimes, including a Qualifying Act of Violence as defined by applicable law (you may refer to the policy on Rights for Victims of a Crime or a Qualifying Act of Violence for additional information), and for any other purpose permitted by applicable law.

Notice Requirements

If the need for sick leave is foreseeable, employees must provide reasonable advance notice, either orally or in writing. If the need is not foreseeable, notice must be provided as soon as practicable.

For foreseeable absences, reasonable advance notice generally means at least 48 hours, when possible.

Paid sick leave is intended for legally permitted purposes and may not be used for non-qualifying personal absences. Time off for medical and dental appointments will generally be treated as sick leave.

PAVIR prohibits misuse of sick leave and may address suspected abuse consistent with applicable law.

Pay and Usage

Non-exempt employees may use accrued sick leave in increments consistent with payroll system capabilities. PAVIR currently permits use in 15-minute increments. Sick leave is paid at a non-exempt employee's regular rate of pay as defined by applicable law at the time the leave is taken. Sick leave hours do not count as hours worked for purposes of calculating overtime.

Exempt employees may be required to use accrued sick leave for partial-day or full-day absences in accordance with applicable law and PAVIR policy. Exempt employees are not expected to use accrued or available sick leave for absences of less than two (2) hours. When an exempt employee is absent for two (2) hours or more for a qualifying reason, sick leave must be used in one-hour increments for the time missed. For example, if an exempt employee is absent for one hour and fifty-nine minutes, sick leave use is not required. If the absence is two hours and fifteen minutes, two hours of sick leave must be used. If the absence is three hours and forty minutes, three hours of sick leave must be used.

Exceptions may apply where leave is taken in connection with FMLA, CFRA, Pregnancy Disability Leave, or other legally protected leave, as required by law.

Employees will not receive pay in lieu of unused paid sick leave. Unused paid sick leave will not be paid out upon termination.

PAVIR prohibits discrimination or retaliation against employees for using their paid sick leave.

Certain counties in California have other paid sick leave ordinances or requirements that may apply to you. Contact Human Resources for more information regarding a local paid sick leave ordinance that may apply to you.

Holidays

Health Benefits

Full-time employees who are regularly scheduled to work 30 or more hours per week are generally eligible to participate in PAVIR's health benefit plans, which may include medical, dental, and vision coverage, subject to the terms of the applicable plan documents.

Eligible employees may elect coverage options available under the applicable plans, which may include employee-only coverage or dependent coverage, consistent with plan provisions.

Benefit eligibility and coverage effective dates are determined in accordance with the terms of the applicable benefit plans and enrollment requirements. Employees must enroll within the required timeframe following a qualifying eligibility event.

Employees may modify benefit elections during the annual open enrollment period or following a qualifying life event, as permitted by plan rules and applicable law.

Employee contributions toward benefit premiums, if any, are deducted from pay in accordance with applicable law. PAVIR reserves the right to modify plan offerings, premium contributions, or coverage terms at any time, subject to applicable law.

Complete details regarding health benefits are contained in the applicable plan documents, which govern in the event of any inconsistency with this handbook.

Additional Benefits

Full-time employees may be eligible to participate in additional benefit programs, which may include:

- Flexible Spending Accounts (FSA)
- Life and Accidental Death & Dismemberment (AD&D) Insurance
- Short-Term and Long-Term Disability Insurance

All employees may be eligible to participate in certain other programs such as the Employee Assistance Program (EAP), commuter benefits, and the 401(k) Retirement Plan, subject to plan eligibility requirements.

401(k) Retirement Plan

PAVIR sponsors a 401(k) Retirement Plan for eligible employees. Employees are generally automatically enrolled at a default employee contribution rate of 6% of eligible compensation after 30 days of employment, unless the employee affirmatively elects a different contribution rate or opts out, in accordance with plan procedures.

PAVIR currently provides a dollar-for-dollar employer match on employee contributions up to 6% of eligible compensation, subject to eligibility requirements. Employer matching contributions generally begin following completion of one year of service, as defined by the plan.

PAVIR also currently provides a discretionary employer profit-sharing contribution of 3% of eligible earnings for eligible employees after one year of service, as defined by the plan.

All employer contributions, including matching and profit-sharing contributions, are subject to the terms of the 401(k) plan document, applicable eligibility and vesting requirements, and may be amended or discontinued in accordance with applicable law.

Complete details regarding participation, eligibility, vesting, and contributions are governed by the official plan documents, which control in the event of any inconsistency with this handbook.

Mandated Benefits

Disability Insurance and Paid Family Leave - California

California employees contribute to the State Disability Insurance (SDI) program through payroll deductions, as required by law. SDI provides partial wage replacement benefits to eligible employees who are unable to work due to a non-work-related illness, injury, pregnancy, or other qualifying condition, or when you are entitled to temporary workers' compensation at a rate less than the daily disability benefit amount, in accordance with applicable law. SDI is a wage supplement provided concurrently while an employee takes an eligible leave of absence under PAVIR policy and applicable law.

The State's Paid Family Leave (PFL) program, funded through employee payroll deductions, provides partial wage replacement benefits to eligible employees for certain qualifying family leave or military-related reasons, in accordance with applicable law. The PFL program is a wage supplement provided concurrently while an employee takes an eligible leave of absence under PAVIR policy and applicable law.

Specific rules and regulations governing disability and paid family leave are available from PAVIR HR. Benefits are administered by the State of California, and eligibility determinations are made by the appropriate state agency.

Unemployment Compensation

Employees whose employment ends or whose hours are reduced may be eligible for unemployment insurance benefits, depending on the circumstances and state law. Eligibility determinations are made by the applicable state agency.

Social Security

Social Security is an important part of every employee's retirement benefit. Employees will see deductions on their paycheck for FICA (Federal Insurance Contributions Act) taxes also known as Social Security and Medicare. PAVIR pays a matching contribution to each employee's Social Security taxes.

Workers' Compensation

PAVIR, in accordance with state law, and at no cost to the employee, provides insurance coverage for employees in the event of work-related injury or illness while employed by PAVIR.

If you sustain a job-related injury or illness, it is important to notify your supervisor and Human Resources immediately. The supervisor will complete an injury report with input from the employee and return the form to the HR department. HR will file the claim with the insurance company. In cases of true medical emergencies, report to the nearest emergency room.

Leave related to a workers' compensation injury may run concurrently with FMLA, CFRA, or other applicable leave laws to the extent permitted by law. The workers' compensation benefits provided to injured employees may include:

- Medical care
- Wage replacement
- Assistance to help qualified injured employees return to suitable employment

COBRA

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA)¹ provides employees eligible for medical benefits and their qualified beneficiaries the opportunity to pay for continued health coverage when a "qualifying event" would normally result in the loss of eligibility. Some examples of common qualifying events are:

- Resignation
- Termination of employment
- Death of an employee
- Reduction in an employee's hours
- Leave of absence beyond twelve weeks
- An employee's divorce or legal separation
- Dependent child no longer meeting eligibility requirements.

Qualified beneficiaries have 60 days from the date of the COBRA election notice (or the date coverage would otherwise end, whichever is later) to elect continuation coverage. COBRA rights and obligations are governed by federal law and the applicable health plan documents, which control in the event of any inconsistency with this handbook.

Leaves of Absence

PAVIR provides leaves of absence in accordance with applicable federal, state, and local laws. Employees may be eligible for statutory or discretionary leave depending on the circumstances, length of service, work location, and other eligibility criteria.

Employees who are absent from work for reasons other than vacation or paid sick leave may be placed on an appropriate leave of absence classification, consistent with applicable law and PAVIR policy.

Because PAVIR employs remote employees within California and in other states, leave administration will be governed by the laws applicable to the employee's primary work location. Where multiple laws may apply, PAVIR will administer leave in accordance with the law providing the greatest protection to the employee, to the extent required by law.

Eligibility thresholds and geographic requirements for statutory leaves will be applied in accordance with governing law.

When PAVIR becomes aware that an employee's absence may qualify for protection under the Family and Medical Leave Act (FMLA), the California Family Rights Act (CFRA), or other applicable leave laws, PAVIR will designate the leave in accordance with applicable law. Where permitted by law, qualifying leave may run concurrently with other available leaves. Employees may not waive or decline statutory leave protections except as permitted under governing law.

Family/Medical Leave and Pregnancy Disability Leave

PAVIR provides leave in accordance with the federal Family and Medical Leave Act (FMLA), the California Family Rights Act (CFRA), and California Pregnancy Disability Leave (PDL), as applicable.

Eligibility for these leaves depends on the employee's length of service, hours worked, work location, and the reason for leave, as defined by law.

Eligibility Requirements (FMLA and CFRA)

To be eligible for FMLA or CFRA leave, an employee must:

- Have at least 12 months of service (which need not be consecutive, subject to statutory limits) over the preceding seven years (unless the break in service was occasioned by the employee taking leave pursuant to USERRA),
- Have worked at least 1,250 hours in the 12 months preceding the start of leave,
- For purposes of FMLA leave, an eligible employee must also be employed at a worksite where there are 50 or more employees of PAVIR within 75 miles.
- Satisfy any additional eligibility requirements required by applicable law.

Employees who are temporarily unable to work due to a disability related to pregnancy, childbirth, or related medical conditions are eligible for PDL.

Where multiple leave laws apply to the same qualifying reason, PAVIR will designate and run leave concurrently to the extent permitted by law.

Amount of Leave

- **FMLA / CFRA**
 - Eligible employees may take up to 12 workweeks of unpaid, job-protected leave in a designated 12-month period for qualifying reasons.
 - FMLA provides up to 26 workweeks of leave in a single 12-month period to care for a covered service member with a serious injury or illness, as defined by law.
 - PAVIR measures the 12-month period for FMLA/CFRA using a rolling 12-month period measured backward from the date leave is used.
 - FMLA qualifying leaves to care for a member of the Armed Services who has a serious illness or injury will be calculated on the 12-month period looking forward.
 - Leave may be taken continuously, intermittently, or on a reduced schedule basis as permitted by law. Intermittent or reduced schedule leave may require medical certification or documentation as permitted by law.
- **Pregnancy Disability Leave (PDL)**
 - Employees disabled by pregnancy, childbirth, or related medical conditions may take up to four months (or 17 1/3 weeks or 693 hours) of unpaid leave per pregnancy, as defined by law.
 - PDL will run concurrently with FMLA when required by law.
 - Actual duration of PDL is determined by medical certification. PAVIR may require medical recertification consistent with applicable law.
 - Following PDL, eligible employees may be entitled to CFRA leave for baby bonding.

Calculating Leave Used

For purposes of calculating leave usage, a “workweek” means the employee’s normally scheduled workweek.

- For employees who work alternative schedules (such as part-time or variable schedules), leave entitlement is calculated on a proportional basis consistent with the employee’s normal schedule.
- When leave is taken intermittently or on a reduced schedule basis, only the amount of leave actually used will be counted against the employee’s total leave entitlement.
- Pregnancy Disability Leave (PDL) provides up to four months (or 17 1/3 weeks or 693 hours) of leave per pregnancy, as defined by California law. The amount of PDL available is based on the employee’s normal work schedule (i.e., hours worked where an employee who works a 40-hour work week is entitled to 693 working hours of leave). When applicable, PDL and FMLA will run concurrently to the extent permitted by law.
- The minimum increment of leave taken will be consistent with PAVIR’s payroll and timekeeping practices and applicable law.

Qualifying Reasons for Leave

Qualifying reasons include, as defined by applicable law:

- The employee’s own serious health condition
 - Disability related to pregnancy, childbirth, or related medical conditions (FMLA/PDL)
- Care for a qualifying family member with a serious health condition

- Baby bonding following birth, adoption, or foster placement
- Qualifying military exigency leave (FMLA/CFRA)
- Military caregiver leave (FMLA)

Employee's Own Serious Health Condition (FMLA / CFRA)

Eligible employees may take up to 12 workweeks of unpaid leave in a designated 12-month period if the employee has a serious health condition that makes the employee unable to perform one or more essential functions of their position, as defined by applicable law.

A serious health condition generally includes an illness, injury, impairment, or physical or mental condition involving inpatient care or continuing treatment by a health care provider, as defined by law. A serious health condition also includes a serious health condition resulting from an on-the-job illness or injury. Under FMLA leave only, a serious health condition also includes a disability caused by pregnancy, childbirth, or related medical conditions, which runs concurrently with PAVIR's separate pregnancy disability leave policy.

Certification requirements are governed by the Notice and Certification section below.

Family Member Serious Health Condition (FMLA / CFRA)

Eligible employees may take up to 12 workweeks of unpaid leave to care for a qualifying family member with a serious health condition, as defined by applicable federal or state law.

The definition of a qualifying family member differs under FMLA and CFRA². Under FMLA, a qualifying family member includes the employee's child, spouse or parent. Under CFRA, a qualifying family member includes the employee's child, spouse, parent, grandparent, grandchild, sibling, registered domestic partner, or designated person.

Certification requirements are governed by the Notice and Certification section below.

Baby Bonding Leave (FMLA / CFRA)

Eligible employees may take up to 12 workweeks of unpaid leave to care for a newborn child, or for bonding with a newborn child or a child placed with the employee for adoption or foster care.

Leave for baby bonding must generally be completed within 12 months of the birth or placement of the child.

An employee who has taken Pregnancy Disability Leave may be entitled to CFRA baby bonding leave following the conclusion of PDL, as provided by law.

Intermittent bonding leave may be permitted in accordance with applicable law.

² For purposes of FMLA only, the term "parent" does not extend to parents-in-law. Further, for purposes of FMLA only, a child does not refer to a child who is over 18 years of age (unless they are incapable of self-care because of a medical or physical disability) nor does it include the child of a registered domestic partner unless the employee stands in loco parentis to the child. "Designated person" means any individual related by blood or whose association with the employee is the equivalent of a family relationship. Only one individual may be a "designated person" per 12-month period.

Qualifying Exigency Leave (FMLA/CFRA)

Eligible employees may take up to 12 workweeks of unpaid FMLA or CFRA leave for a “qualifying exigency” arising out of the foreign deployment of the employee’s spouse, registered domestic partner (CFRA only), child, or parent who is a member of the Armed Forces (including the National Guard and Reserves) on covered active duty or called to covered active duty status.

Qualifying exigencies may include, as defined by law:

- Short-notice deployment (up to seven calendar days)
- Military events and related activities
- Childcare and school-related activities
- Parental care activities
- Financial and legal arrangements
- Counseling
- Rest and recuperation (up to fifteen calendar days per deployment, or as otherwise permitted by law)
- Post-deployment activities
- Additional activities agreed upon by PAVIR and the employee
- Employees may be required to provide appropriate certification supporting the need for qualifying exigency leave.

Military Caregiver Leave (FMLA)

Eligible employees may take up to 26 workweeks of unpaid leave during a single 12-month period to care for a spouse, child, parent, or "next of kin" who is a covered service member with a serious injury or illness.

A covered service member includes:

- A current member of the Armed Forces (including the National Guard or Reserves) undergoing medical treatment, recuperation, or therapy for a serious injury or illness; or
- A covered veteran undergoing medical treatment, recuperation, or therapy for a qualifying serious injury or illness, as defined by law.

Certification requirements are governed by the Notice and Certification section below.

Notice and Certification

Employees should provide notice of the need for leave as soon as practicable. When leave is foreseeable, employees should provide at least 30 days’ notice where possible.

PAVIR may require medical certification supporting the need for leave in accordance with applicable law. Failure to provide required certification may result in delay or denial of protected leave designation to the extent permitted by law. PAVIR may also require a health care provider’s verification of their fitness to return to work prior to reinstatement when permitted by law. PAVIR will provide all required notices and designation forms under the FMLA, and CFRA including, but not limited to, the Notice of Eligibility and Rights and Responsibilities and Designation Notice, as required by law.

If an employee does not return to work on the first workday following the expiration of an approved FMLA/CFRA leave, they may be deemed to have resigned from your employment, to the extent permitted by law.

If PAVIR has sufficient information to determine that leave qualifies under FMLA, CFRA, or PDL, PAVIR will designate the leave accordingly in compliance with applicable law. Leave that qualifies under these laws will be counted against the employee's statutory entitlement regardless of whether the employee requests such designation. In circumstances where an employee is eligible for FMLA/CFRA leave but declines to have the leave designated as such, PAVIR will not continue to pay the employer's portion of health insurance premiums during the period of leave, subject to the terms and conditions of the applicable health plan(s). In such cases, the employee may elect to continue health coverage at their own expense through COBRA, if eligible, in accordance with federal and state COBRA laws.

Wage Replacement Programs

Certain leaves of absence may qualify for wage replacement benefits administered by the State of California or other agencies. These programs provide partial wage replacement but do not themselves create a right to job-protected leave. To the extent permitted by law, PAVIR may require or employees may elect to use available accrued paid leave during otherwise unpaid portions of statutory leave.

California State Disability Insurance (SDI)

Employees who are unable to work due to their own non-work-related disability, including pregnancy-related disability, may be eligible for California State Disability Insurance (SDI) benefits. SDI is funded through employee payroll deductions and administered by the California Employment Development Department (EDD).

SDI provides partial wage replacement for a limited period, as provided by law.

Where permitted by law, employees may elect to use accrued vacation or available paid sick leave to supplement SDI benefits so that the combined total does not exceed the employee's regular wages. Supplementation will be administered in accordance with applicable law and PAVIR policy.

California Paid Family Leave (PFL)

Employees who take leave to bond with a new child, care for a qualifying family member with a serious health condition, or for certain military-related reasons may be eligible for California Paid Family Leave (PFL) benefits. PFL is funded through employee payroll deductions and administered by the EDD.

PFL provides partial wage replacement for a limited duration as defined by law. Eligibility for PFL does not require eligibility for FMLA or CFRA.

Where permitted by law, employees may elect to supplement PFL benefits with accrued vacation or available paid sick leave, up to the amount of the employee's regular wages.

Health Benefits During Leave

During FMLA/CFRA and Pregnancy Disability Leave, group health benefits will be maintained in accordance with applicable law.

Employees remain responsible for their portion of premium contributions. Failure to timely remit required employee premium contributions may result in lapse of coverage, to the extent permitted by law.

Benefit Accrual

Accrual of vacation, accrued paid sick leave, holiday, and other benefits will be governed by applicable policy and law. Such accruals will generally be suspended during unpaid portions of leave unless otherwise required by law.

Use of Accrued Vacation/Paid Sick Leave

Employees will be required to use any accrued vacation during unpaid family and medical leave consistent with this policy unless they are eligible for and applying for Paid Family Leave benefits provided by the State of California. Employees will also be required to use any available paid sick leave during unpaid family and medical leave that is due to their own serious health condition. If mutually agreed upon between PAVIR and the employee, paid sick leave may be used for the care of a qualifying family member or in connection with the birth (including baby bonding), adoption or foster care of a child.

Employees will be required to use any available sick time during any unpaid portion of PDL. Employees may also elect to use any accrued vacation time during any unpaid portion of PDL. If an employee is receiving benefit payments pursuant to a disability insurance plan (such as California's State Disability Insurance plan or Paid Family Leave program), the employee and PAVIR may mutually agree to supplement such benefit payments with available vacation and/or available sick leave.

PDL Reasonable Accommodations

For employees who are eligible for PDL, PAVIR will make a good faith effort to provide reasonable accommodations and/or transfer requests when such a request is medically advisable based on the certification of a health care provider. When an employee's health care provider finds it is medically advisable for an employee to take intermittent leave or leave on a reduced work schedule and such leave is foreseeable based on planned medical treatment because of pregnancy, PAVIR may require the employee to transfer temporarily to an available alternative position. This alternative position will have an equivalent rate of pay and benefits and must better accommodate recurring periods of leave than the employee's regular job.

Reinstatement

Upon return from protected leave, employees will be reinstated to the same or a comparable position in accordance with applicable law.

Employees have no greater right to reinstatement than if they had remained continuously employed. In certain circumstances under FMLA leave only, "key" employees may not be eligible for reinstatement following a family and medical leave. PAVIR will provide written notice to any "key" employee who is not eligible for reinstatement.

For additional information regarding leave eligibility or coordination of benefits, employees should contact Human Resources.

Personal Leave

PAVIR may, at its discretion, grant an unpaid personal leave of absence for compelling personal reasons that are not otherwise covered by federal, state, or local leave laws.

Requests for personal leave should be submitted to Human Resources as far in advance as practicable and must be approved in writing. Approval of personal leave is not guaranteed and will be evaluated based on operational needs, the reason for the request, and other relevant factors.

Any leave that qualifies under FMLA, CFRA, PDL, or any other applicable leave law will be designated and administered in accordance with the applicable law and will run concurrently with any discretionary personal leave where permitted.

Benefits During Personal Leave

If a personal leave is not protected under applicable law, continuation of benefits, if any, will be governed by applicable plan documents and law. Employees may be offered continuation coverage in accordance with COBRA or other applicable laws where eligibility requirements are met.

Employees are responsible for any required employee premium contributions during an approved personal leave.

Use of Accrued Paid Leave

During an approved personal leave, employees may be permitted or required to use accrued vacation in accordance with PAVIR policy. Use of paid sick leave will be governed by applicable law and policy.

Accrual of Benefits

Vacation, accrued sick leave, and other benefit accruals will be suspended during unpaid portions of a discretionary personal leave to the extent permitted by law.

Reinstatement Following Personal Leave

Reinstatement following a discretionary personal leave that is not protected by law is not guaranteed. If a position is available at the time of the employee's scheduled return and the employee is qualified for the position, PAVIR will consider reinstatement. Nothing in this policy alters the at-will nature of employment.

Additional Leave

Unpaid Medical Leave of Absence (Reasonable Accommodation Leave)

In an effort to comply with its duty to accommodate employees with qualifying disabilities, PAVIR may provide leaves of absence without pay when an employee is temporarily unable to work due to a mental or physical disability, certified in writing by their health care provider, unless such leave would cause an undue hardship. Approved absences of less than two weeks are not treated as medical leaves of absences but rather as excused absences without pay.

Employees will be required to use any accrued vacation and available paid sick leave during any unpaid portion of this leave. Benefit accrual, such as vacation, accrued paid sick leave, and holiday benefits, will be suspended during an unpaid medical leave period and will resume upon return to active employment. Unless otherwise required by law, PAVIR does not continue to pay premiums for health insurance coverage for employees on unpaid medical leave. However, if eligible, employees may self-pay the premiums under the provisions of COBRA.

Bereavement Leave

PAVIR provides up to five (5) days of paid bereavement leave per occurrence following the death of a covered family member. Bereavement leave under this policy is available upon hire and is not subject to a minimum length of service requirement.

For purposes of this policy, a covered family member includes a spouse, domestic partner, child (including foster child, stepchild, legal ward, child of a domestic partner, or a child to whom the employee stands in loco parentis), parent, legal guardian, sibling, grandparent, grandchild, parent-in-law, sibling-in-law, child-in-law, or other individual as required by applicable law.

Bereavement leave must be completed within three (3) months of the date of death and may not be taken after that time. The leave need not be taken consecutively.

Employees may take additional unpaid time off and may use up to three (3) days of available paid sick leave in connection with a covered bereavement, without additional approval. Employees may also request to use accrued vacation or other available paid leave in accordance with applicable policy. Where required by law, bereavement leave will be provided in accordance with statutory requirements. If this policy provides greater benefits than required by law, PAVIR will administer leave in accordance with this policy.

PAVIR will not retaliate against an employee for requesting or taking bereavement leave in accordance with this policy or applicable law.

PAVIR may request documentation of the death in accordance with applicable law. Documentation may include a death certificate, published obituary, written verification of death, or other reasonable documentation.

Bereavement leave must be recorded appropriately on the employee's time record in accordance with payroll procedures.

Reproductive Loss Leave

In accordance with California law, PAVIR provides Reproductive Loss Leave for events including miscarriage, stillbirth, failed adoption, failed surrogacy, or unsuccessful assisted reproduction as those terms are defined by the applicable statute. PAVIR will provide five days of unpaid leave for a reproductive loss event. This leave is unpaid; however, employees may elect to use available accrued vacation and/or available paid sick leave during this time in accordance with applicable law and policy. Employees who have been employed for at least 30 days prior to the start of leave are eligible for this leave. The employee need not take the five days consecutively, but the leave must be completed within three months after the reproductive loss event unless the employee is already on or chooses to go on any other leave provided under federal or state law either before or immediately after the reproductive loss event. Employees may request leave for multiple reproductive loss events in a single year up to a maximum of 20 days of leave within a 12-month period. PAVIR prohibits discrimination, interference, or retaliation against any employee for requesting or taking leave under this policy. PAVIR will maintain the confidentiality of any information provided in connection with a request for Reproductive Loss Leave, consistent with applicable law. Employees should notify Human Resources or their supervisor as soon as practicable to request leave under this policy.

Military Leave

Employees who serve in the uniformed services, including the active military, National Guard, Reserves, or Naval Militia, are entitled to leave and reinstatement rights in accordance with all applicable federal and state law, including but not limited to the Uniformed Services Employment and Reemployment Rights Act (USERRA). Employees should contact Human Resources at hr@pavir.org for information regarding their rights and responsibilities before and after such leave. In addition to USERRA and other applicable state and federal law, employees who are members of the National Guard, Reserves, or Naval Militia are entitled to unpaid leave for required military training or service as provided by applicable law, which may include up to 17 days per calendar year for certain training or duty under California law. Employees will receive all rights and protections provided by federal and state law. Upon timely return from military service, employees will be reinstated in accordance with applicable federal and state law. Benefit accrual during military leave will be administered in accordance with applicable federal and state law.

Military Spouse Leave

Qualified employees are eligible for up to 10 days of unpaid leave when their spouse or domestic partner is on leave from military deployment. A qualified employee is one who regularly works at least 20 hours per week and whose spouse or domestic partner is a member of the Armed Forces, National Guard, or Reserves and is on leave from deployment during a period of military conflict, as defined by law.

If you are eligible for such leave, please submit a written request for leave to Human Resources at hr@pavir.org as soon as practicable after receiving official notice that your spouse or registered domestic partner will be on leave from deployment. You will also be required to provide written documentation certifying that your spouse or registered domestic partner will be on leave from deployment.

Employees may elect to use accrued vacation or other available paid leave during this leave in accordance with applicable law and policy.

If no vacation time is available, the employee may take this time off without pay.

Exempt employees will receive their regular pay only if required by applicable law. Employees who need time off to participate in a qualifying event resulting from a family member's deployment to a foreign country may be eligible for Paid Family Leave benefits.

Jury Duty

PAVIR encourages employees to serve on jury duty when called. The employee should notify their supervisor of the need for time off for jury duty as soon as a notice or summons from the court is received.

Employees must provide written verification from the court clerk of performance of jury service to receive Jury Duty pay and should email documentation to payroll@pavir.org. Regular full-time employees classified in non-exempt positions will receive full pay while serving up to 5 days of jury duty. Exempt employees will receive their full salary for any workweek in which they perform any work, in accordance with applicable wage and hour laws. Jury duty leave for employees not otherwise eligible for paid jury duty under this policy will be unpaid. Employees may elect to use any accrued vacation or sick leave during any period of jury duty which is unpaid. If work time reasonably remains after any day of jury selection or jury duty, the employee may be expected to return to work for the remainder of their scheduled workday.

Employees may retain any mileage allowance or other fee paid by the court for jury services.

PAVIR shall not terminate or discriminate against employees who serve on a jury as set forth in this section.

Witness Duty

Employees who have received a subpoena or other court order to testify as a witness in a court or judicial proceeding will be granted unpaid leave to appear in court or a judicial proceeding as a witness. Employees should notify their supervisor as soon as they receive a subpoena or court order so the supervisor can make arrangements to accommodate their absence. In addition, employees may be asked to provide a copy of the official subpoena or court order to their supervisor. If work time reasonably remains after judicial proceedings conclude, the employee may be expected to return to work for the remainder of their scheduled workday. Employees may elect to use any accrued vacation or paid sick leave during witness duty leave.

Non-exempt employees who are subpoenaed to appear as a witness at court or in a judicial proceeding will be provided time off without pay except as set forth below. Exempt employees will receive their regular salary unless they do not work any hours during the course of a workweek. Employees may elect to use accrued vacation or available sick leave while serving as a witness.

In the event that the employee must serve as a witness within the course and scope of their employment with PAVIR, PAVIR will provide time off with pay.

PAVIR will not discharge, threaten, or otherwise discriminate or retaliate against an employee for taking time off to serve as a witness as required by law.

Time Off to Vote

PAVIR encourages all employees to vote. Employees are eligible for up to two hours of paid leave to vote in federal, state, city, or county elections if they are unable to vote during non-working hours and have not requested an absentee ballot. For appropriate timecard coding, please contact payroll at payroll@pavir.org. Most polling facilities for elections for public office are scheduled to accommodate working voters. PAVIR encourages employees to schedule their voting during non-work hours, when possible. If an employee anticipates a conflict, they must notify their supervisor as early as possible so that schedule adjustments may be considered. Employees must provide proof of voting, such as a voter's receipt, on the first working day following the election to qualify for paid time off. This policy does not require employees to bring or mail absentee ballots from the workplace.

Religious Holiday Leave

Employees may request time off to observe a religious holiday, subject to scheduling accommodations that do not cause undue hardship to the department or laboratory. Time off will be charged to available vacation or taken as unpaid leave.

Organ and Bone Marrow Donor Leave

Employees who are donors for organ or bone marrow may take paid time off as follows:

- Employees may take up to 30 business days (i.e., days the employee is normally scheduled to work) of paid leave (and up to another 30 business days of unpaid leave) in any one-year period for the purpose of donating an organ to another person. The one-year period is calculated from the date the employee begins the leave.

- Employees may take up to five business days (i.e., days the employee is normally scheduled to work) of paid leave in any one-year period for the purpose of donating bone marrow to another person. The one-year period is calculated from the date the employee begins the leave.

The one-year period consists of 12 consecutive months.

PAVIR requires that bone marrow donors use up to five days of available paid sick leave (PSL) or vacation during the leave period, and that organ donors use up to ten days of available PSL or vacation during the leave period. After the required use of accrued paid leave is exhausted, PAVIR will pay the remaining portion of the statutory paid donor leave, up to the maximum allowed by law.

During the leave for organ/bone marrow donors, PAVIR will continue to provide and pay for any group health plan benefits the employee was enrolled in prior to the leave of absence, and the employee will be required to contribute their portion of the premium.

To qualify for this leave, an employee must have been employed by PAVIR for at least 90 days immediately preceding the commencement of the leave. Employees requesting organ or bone marrow donor leave must provide written verification of the medical necessity for the donation and confirmation that the employee is an organ or bone marrow donor, as permitted by law.

Civil Air Patrol Leave

PAVIR will provide employees with at least 90 days of employment time off to perform emergency duty as a volunteer member of the California Civil Air Patrol and who have been duly directed and authorized to respond to an emergency operational mission of the California Wing of the Civil Air Patrol.

Employees who are Civil Air Patrol volunteers should notify their supervisor and email hr@pavir.org as soon as practicable if they may need to take leave for emergency duty. When possible, advance notice should be provided before leaving work.

Eligible employees may take up to 10 days of unpaid leave per calendar year for Civil Air Patrol emergency duty. Leave for a single emergency mission may not exceed three days unless the emergency is extended by the entity in charge of the operation and the extension is approved by PAVIR.

Employees may elect to use accrued vacation during unpaid Civil Air Patrol leave. Otherwise, the time off is unpaid.

PAVIR will restore the employee to the position they held when the leave began or to a position with equivalent seniority status, employee benefits, pay, and other terms and conditions of employment, unless the employee is not restored because of conditions unrelated to the exercise of the leave rights by the employee.

School Activities Leave

In accordance with California law, employees who are parents, guardians, stepparents, foster parents, or grandparents with custody of a child enrolled in kindergarten through grade 12, or a licensed child care provider, may take time off to participate in school or child care activities. The time off is limited to 40 hours of unpaid leave per year to participate in the activities of the school or day care facility, to find, enroll or reenroll a child in a school or with a licensed child care provider and/or to address a child care provider or school emergency. Employees may take no more than eight hours off for this purpose in any one calendar month.

Leave under this policy is subject to the following:

- Employees must provide reasonable advance notice when the need for leave is foreseeable.
- Leave is unpaid; however, employees may elect to use accrued vacation to receive compensation.
- PAVIR will not discharge or discriminate against an employee for taking leave under this policy.

Suspension

If an employee who is the parent or guardian of a child in kindergarten through grade 12 is required to appear at the child's school due to suspension from school, the employee may take unpaid time off to attend the meeting. Employees may elect to use accrued vacation during this leave. No employee will be discharged or discriminated against for taking time off under this policy.

Emergency Duty/Training Leave

Employees will not be disciplined for taking time off to perform emergency duty or training as a volunteer firefighter, reserve peace officer, or emergency rescue personnel, in accordance with California law.

Employees should notify their supervisor and email hr@pavir.org as soon as practicable if they may need leave for emergency duty or training. When possible, advance notice should be provided.

Leave for emergency training may not exceed 14 days per calendar year.

Emergency duty or training leave is unpaid. Employees may elect to use accrued vacation but are not required to do so.

PAVIR prohibits retaliation or discrimination against employees for taking or requesting leave under this policy.

Adult Literacy Leave

Pursuant to California law, PAVIR will reasonably accommodate employees who seek to enroll in an adult literacy education program, provided the accommodation does not create an undue hardship.

This leave is unpaid. Employees may elect to use accrued vacation to receive compensation.

Alcohol and Drug Rehabilitation Leave

In accordance with California law, PAVIR will reasonably accommodate employees who voluntarily seek participation in an alcohol or drug rehabilitation program, provided the accommodation does not create an undue hardship.

This leave is unpaid. Employees may elect to use accrued vacation or available paid sick leave to receive compensation.

Nothing in this policy limits PAVIR's right to enforce its Drug and Alcohol-Free Workplace policy or to discipline employees for violations of that policy

Victims of Crime, Qualifying Acts of Violence, and Workplace Protections

PAVIR provides leave and workplace protections to employees who are victims of certain crimes or qualifying acts of violence, in accordance with applicable California law.

Time Off for Judicial Proceedings for Victims of a Crime

An employee who is a victim of a crime, or whose family member is a victim of a crime, may take unpaid time off to attend judicial proceedings related to the crime, including but not limited to delinquency proceedings, post-arrest release decision, plea, sentencing, post-conviction release proceedings, or other proceedings in which the victim's rights are at issue.

For purposes of this policy, "family member" includes an individual related by blood or whose association with the employee is the equivalent of a family relationship. A designated person may be identified at the time leave is requested, and PAVIR may limit an employee to one designated person per 12-month period where permitted by law.

In general, employees are not required to provide documentation for time off under this policy. However, employees shall provide reasonable advance notice of their intent to take time off, unless advance notice is not feasible. If employees are unable to provide advance notice for time off under this policy, they can provide certification of their absence (such as a police report, court order, or health care provider certification, or other documentation that reasonably verifies that the crime or abuse occurred and their absence was for an authorized purpose) within a reasonable time period thereafter. If employees provide reasonable advance notice or provide documentation within a reasonable time period thereafter for an unscheduled absence, they will not be subject to any disciplinary action for time off under this policy.

For purposes of this policy, a crime is a felony provision proscribing theft or embezzlement or a violent or serious felony as set forth in Government Code section 12945.8(j)(8)(C)(i). Victims who suffer direct or threatened physical, psychological or financial harm as the result of crimes identified in Government Code Section 12945.8(j)(8)(C)(ii) are also eligible for leave under this section.

This leave is unpaid. However, employees may use accrued vacation (if applicable) or available paid sick leave for this leave. Leave may not exceed 12 weeks and will run concurrently with FMLA/CFRA leave if you are eligible for such leave. This section does not provide an employee with a right to leave that exceeds that provided under the FMLA.

PAVIR will not discriminate or retaliate against an employee for their status as a victim of a crime or having a family member who is a victim of a crime if the employee gives notice to PAVIR of their status or PAVIR has actual knowledge. PAVIR will not discriminate or retaliate against an employee for taking leave pursuant to this section

Time Off for Victims of a Qualifying Act of Violence (QAV)

An employee who is a victim of a qualifying act of violence, including domestic violence, sexual assault, stalking, or any act, conduct, or pattern of conduct that includes (i) bodily injury or death to another; (ii) brandishing, exhibiting, or drawing a firearm or other dangerous weapon; or (iii) a perceived or actual threat to use force against another to cause physical injury or death, may take time off to seek relief related to the QAV. If an employee is (or has a family member who is) a victim of a QAV, they may take time off from work for any of the following purposes related to that QAV

- obtaining a restraining order or other injunctive relief to help ensure the health, safety, or welfare of the employee or their child
- obtaining or attempting to obtain relief, such as a restraining order or other injunctive relief;
- seeking or obtaining medical attention for or to recover from injuries;

- seeking or obtaining services from a domestic violence shelter or similar victim services organization;
- seeking or obtaining psychological counseling or other mental health services;
- participating in safety planning;
- relocating or engaging in the process of securing a new residence, including temporary or permanent housing or enrolling children in a new school;
- providing care to a family member who is recovering from injuries;
- seeking or obtaining civil or criminal legal services;
- preparing for, participating in, or attending any civil, administrative, or criminal legal proceeding; or
- seeking, obtaining, or providing childcare or care to a care-dependent adult if necessary to ensure the safety of the child or dependent adult

Employees will not be retaliated or discriminated against for participating in the legal process. Employees will also not be discriminated against or retaliated against because of their, or their family member's, status as a victim of a QAV. "Family member" is defined to include: a child, parent, grandparent, grandchild, sibling, spouse, or domestic partner (as those terms are defined under the CFRA); or a designated person, who does not need to be a blood relative, so long as their association with the employee is the equivalent of a family relationship. An employee may identify a "designated person" at the time they request leave, but the employer may limit an employee to one designated person per 12-month period. Employees are permitted to take leave for these purposes whether or not any person is arrested for, prosecuted for, or convicted of committing the crime.

Employees may be entitled to up to 12 weeks of leave where provided by law. If the employee is the victim of the QAV, the employee may take up to 12 weeks of leave. If the employee's family member is the victim of the QAV, the employee may take up to 5 days for relocation purposes or to enroll their child in a new school or new childcare while the total leave is limited to 10 days. However, if the victim is deceased as a result of the QAV, the employee may take up to 12 weeks of leave.

Leave under this section will run concurrently with FMLA or CFRA leave where applicable and will not exceed statutory limits.

Employees may use available vacation (if applicable) or available paid sick leave during this leave. Otherwise, the time off is unpaid.

Notice and Documentation

Employees should provide reasonable advance notice of the need for leave when feasible. If advance notice is not possible, documentation may be required within a reasonable time following the absence. Acceptable documentation may include a police report, court order, health care provider certification, or other reasonable verification permitted by law.

Reasonable Accommodation and Confidentiality

Employees who are victims of a QAV (or who have a family member who is) a victim of a QAV) may request reasonable workplace accommodations (i.e., for help or changes in their workplace) to ensure their

safety. PAVIR will engage in a good faith interactive process to determine effective accommodations that do not impose an undue hardship.

Information provided under this policy will be maintained as confidential to the extent required by law.

No Retaliation or Discrimination

PAVIR prohibits discrimination or retaliation against employees for exercising rights under this policy or applicable law.

Employees who have questions about this policy should contact Human Resources.

Right to File a Complaint

If any employee believes that they have experienced retaliation or discrimination as a result of conduct protected by this policy, the employee may file a complaint with their supervisor and/or the Labor Commissioner's Office. For more information, contact the Labor Commissioner's Office by phone at 213-897-6595 or visit a local office by finding the nearest one on its website: www.dir.ca.gov/dlse/DistrictOffices.htm. The Labor Commissioner's Office provides an interpreter at no cost to the employee, if needed.

Lactation Accommodations & Break

PAVIR accommodates lactating employees by providing reasonable time and access to a private area during the workday to any employee who desires to express breast milk. The time shall, if possible, run concurrently with any meal and/or rest period(s) already provided to the employee. Any additional reasonable time needed to express breast milk that does not run concurrently with a meal and/or rest period(s) already provided to the employee shall be provided on an unpaid basis, unless otherwise directed by state law.

PAVIR will provide lactating employees with the use of a room or other private location which is located close to the employee's work area. Employees with private offices may use their offices to express breast milk if it allows the employee to express milk in private.

In certain circumstances, a temporary location, multipurpose room, or shared space may be provided in accordance with applicable law.

The location will also meet the following requirements:

- not be a bathroom
- be free from intrusion
- be shielded from view
- be safe, clean, and free of hazardous materials
- contain a surface to place a breast pump and personal items
- contain a place to sit; and
- have access to electricity or alternative devices, including, but not limited to, extension cords or charging stations, needed to operate an electric or battery-powered breast pump.

In addition, PAVIR shall provide access to a sink with running water and a refrigerator suitable for storing milk near the employee's work area. If a refrigerator cannot be provided, PAVIR may provide another cooling device suitable for storing milk, such as a PAVIR-provided cooler.

Employees who desire lactation accommodations should contact their supervisor or HR to request accommodation. PAVIR will respond to lactation accommodation requests promptly and in accordance with applicable law.

If any employee believes that they have experienced retaliation or discrimination as a result of conduct protected by this policy, the employee may file a complaint with their supervisor and/or the Labor Commissioner's Office. Employees may also contact the California Labor Commissioner's Office for additional information.

Property and Information

All lockers, furniture, desks, computers, electronic devices, electronic communications systems, and electronically stored information provided by PAVIR are and remain the property of PAVIR and are provided for business purposes.

For purposes of this policy:

- “Computers” include desktops, laptops, servers, tablets, smartphones, and related hardware or software.
- “Electronic communications” include email, messaging platforms, voicemail, text messages, social media accessed through PAVIR systems, telephones, and Internet services.
- “Electronic information” includes all data created, transmitted, received, or stored using PAVIR systems or devices.
- “Electronic devices” include peripheral equipment such as monitors, keyboards, storage devices, cameras, and similar equipment.

PAVIR property must be used primarily for business purposes and maintained with reasonable care. Employees must obtain prior supervisor approval before removing PAVIR property from the premises unless remote work has been authorized. All PAVIR property must be returned immediately upon request, a leave of absence, or termination.

Employees using VA equipment or accessing VA systems or information must comply with all applicable VA policies and federal requirements governing such use.

Personal Property

For security reasons, employees should not leave personal belongings of value in the workplace. PAVIR is not responsible for any lost or stolen personal items at work.

Terminated employees should remove any personal items at the time they leave PAVIR. Personal items left in the workplace are generally subject to disposal if not claimed at the time of an employee’s termination.

Monitoring of Property and Information

PAVIR reserves the right to inspect, access, review, and monitor all PAVIR property and systems at any time, with or without notice. Employees should have no expectation of privacy in any communications, data, or materials created, stored, transmitted, or received using PAVIR systems or property. Passwords do not create an expectation of privacy. PAVIR may access or override password-protected systems when necessary for legitimate business purposes. Employees may not access another employee’s electronic communications or accounts unless authorized as part of their job duties.

Additional VA or third-party privacy requirements may apply where VA or sponsor systems are involved.

PAVIR reserves the right to use and disclose any communication shared on its Property or Information without the permission of or any prior notice to any employee, including disclosure to law enforcement officials.

Prohibited Use of Property / Information

Employees may not use PAVIR property or systems:

- To transmit discriminatory, harassing, retaliatory, obscene, or unlawful content (PAVIR's policies against discrimination, harassment, and retaliation apply to the use of PAVIR's Property & Information)
- To violate copyright, trademark, licensing, or intellectual property laws
- To access, disclose, or transmit confidential or proprietary information without authorization
- To engage in illegal activity
- To misuse PAVIR assets

This list is not exhaustive and employees are prohibited from using PAVIR's Property & Information for any unauthorized or unlawful purpose. Nothing in this policy is intended to restrict employees from engaging in protected concerted activity under applicable labor laws, including discussing wages, hours, or working conditions. Violations may result in discipline, up to and including termination.

Confidentiality and Proprietary Information

PAVIR employees are required to maintain the confidentiality of information obtained during the course of their duties. This includes:

- **VA Confidential Information:** Many PAVIR employees hold a VA Without Compensation (WOC) appointment or are detailed to the VA under the Intergovernmental Personnel Act (IPA) Mobility Program. Such employees are subject to multiple federal confidentiality laws and VA policies, including but not limited to the Privacy Act (5 U.S.C. § 552a), the Health Insurance Portability and Accountability Act (HIPAA), the Freedom of Information Act (5 U.S.C. § 552), 38 U.S.C. §§ 5701, 5705, and 7332, and VHA Directive 1605.01. Individuals serving in a VA capacity, including PAVIR employees with a VA WOC appointment, are bound by 18 U.S.C. § 1905 (the Federal Trade Secrets Act) and other applicable federal criminal statutes, including the Economic Espionage Act (18 U.S.C. §§ 1831–1839), which prohibit the unauthorized disclosure or misappropriation of confidential or proprietary information obtained in the course of official duties. Individually identifiable information in VA patient records, research data, employee records (including licensure and credentialing information), and other confidential materials may be accessed, used, or disclosed only as authorized by applicable law and VA policy. Nothing in this Handbook is intended to conflict with applicable VA, VAPAHCS, or federal and state laws or regulations. Where another entity's policy or governing law imposes stricter confidentiality requirements, those requirements will control. PAVIR employees remain employees of PAVIR and are not employees of the U.S. Department of Veterans Affairs solely by virtue of a VA Without Compensation (WOC) appointment or IPA detail.
- **Third-Party Confidential Information:** This includes confidential or proprietary information obtained from external sponsors, collaborators, research partners, vendors, or other third parties. Examples include trade secrets, financial data, research protocols, unpublished data, grant applications, contractual terms, and business strategies. Such information must be protected in accordance with applicable agreements, contractual obligations, and law, and may not be accessed, used, or disclosed except as authorized for legitimate business or research purposes.

- **PAVIR Confidential Information:** Includes all non-public proprietary information relating to PAVIR's operations, research activities, financial data, strategic plans, personnel information, intellectual property, and internal business matters. Such information may be accessed, used, or disclosed only for legitimate business purposes and only by individuals authorized to receive it. Unauthorized use, disclosure, removal, or retention of PAVIR confidential information is strictly prohibited.

Employees may not access confidential information except as required to perform their job duties. Employees must not use confidential information for personal gain or disclose it to any third party without written consent from the CEO, except as required by law or PAVIR-approved research projects. This obligation continues both during and after employment with PAVIR.

PAVIR prohibits audio and/or video recordings in the workplace, during working hours, without authorization of PAVIR due to privacy and confidentiality concerns and protections.

Nothing in this section is intended to prohibit or restrict employees from exercising their rights under the NLRA, which includes discussing their wages and working conditions.

Any employee who discovers misuse of PAVIR's Property or Information Systems should contact Human Resources. Any employee who violates any part of this policy will be subject to discipline, up to and including immediate termination.

Sponsored Research Information

The policy above includes that PAVIR employees and Principal Investigators (PIs) working on PAVIR administered studies will not disclose VAPAHCS or sponsor's confidential information to any person, except the sub-investigators, members of the PAVIR Institutional Review Board (IRB) of record (i.e., Stanford's IRB), and VAPAHCS Research and Development Committee, or as required to the Food and Drug Administration, without the prior written consent of the sponsor, VAPAHCS, or PAVIR, as applicable.

However, PAVIR may disclose the sponsor's and PI's names, total funded amount, and a general non-confidential title of the study without the sponsor's consent to VAPAHCS and in any government report required of PAVIR. PAVIR, its employees, and PIs must also agree to take all reasonable precautions to prevent disclosure of sponsor's confidential information to a third party.

The provisions of this section do not apply to any information which, upon receiving notice of such required disclosure to permit sponsor to oppose same by appropriate legal action:

- Were known to PAVIR, its employees, or the PI prior to receiving that information either directly or indirectly from the sponsor
- Is generally known to the public or which becomes generally known to the public through no act or omission on the part of PAVIR, its employees, or the PI
- Is disclosed to PAVIR, its employees, or the PI at any time by a third party who had a legal right to disclose it
- Is needed for purposes of treating a patient who participated in the study
- Is required by law, regulation, governmental or judicial order, or subpoena to be disclosed, provided PAVIR and/or PI shall notify VAPAHCS or sponsor immediately

Inventions

PAVIR employees directly involved in VA research and associated intellectual property are governed by Federal law regarding the management and disposition of intellectual property. Any information, invention, discovery, innovation, suggestion, idea, communication, or report (whether patentable or not) (collectively “Invention”), conceived, reduced to practice, made, or developed by PAVIR employees using resources provided by the VA in conducting the Study, is controlled by Federal law (35 U.S.C. §§ 102 & 200-212, 37 C.F.R. Part 501, and 38 C.F.R. §§ 1.650-1.663). Such inventions resulting from a Study must be disclosed to VAPAHCS.

Additional rules, regulations, and disclosure requirements from the associated research project sponsor may apply, including disclosure to the Stanford University Office of Technology Licensing. PAVIR employees are strongly encouraged to consult with their laboratory or department supervisor or Principal Investigator for further details.

Additional considerations under California law may apply to certain employees.

Copyrighted Materials

Many materials used by PAVIR employees in the course of their work are protected by copyright laws. Examples include computer software, models, medical and professional journals, books, and other materials. Presentation slides and training manuals created by outside consultants or contractors may also be copyrighted. Reproducing or distributing copyrighted materials without the permission of the copyright owner may violate copyright laws. Computer programs are similarly protected and may not be copied unless explicitly permitted by the copyright holder.

Employees who have questions about reproducing materials that may be protected by copyright should contact the CEO, who may refer the matter to PAVIR’s legal counsel.

Research Results and Other Project Information

Employees are prohibited from disclosing or sharing research results or other project information related to their PAVIR-paid work for VA-approved projects or for work conducted in preparation for such projects. Employees should consult with their Principal Investigator (PI) if they have questions about what data, results, or processes should be considered confidential.

Computer and Internet Use

PAVIR employees are granted access to computers, electronic communications, electronic information, and IT resources, including the Internet, to support their work-related tasks. These resources are primarily for business purposes.

While occasional personal use is permitted, it should not interfere with job performance, detract from work time, consume resources, or violate PAVIR policies (including those on harassment, discrimination, retaliation, and confidentiality). All usage of PAVIR resources, including personal use, may be monitored without notice. Employees should not expect privacy in using these resources.

If provided with a VA computer or Internet access, employees should consult with their supervisor for additional applicable guidelines.

Computer Password Security

Passwords are assigned to authenticate a user's identity, to protect network users, and to provide security. It is the responsibility of each user to protect and to keep private all passwords issued to them by PAVIR, VAPAHCS, Stanford, or through any other channels in the conduct of PAVIR work.

Individual users are responsible for maintaining the security of their accounts. This includes, but is not limited to, locking their workstations when leaving their desks and logging off the system when leaving each day after work.

The possession or collection of passwords, or other secure identification information belonging to other PAVIR employees, collaborators, and colleagues with whom the employee works in the furtherance of PAVIR work is prohibited.

Computer facilities have tangible value. Consequently, attempts to circumvent accounting systems or to use the computer accounts of others will be treated as forms of attempted theft. As a systems user, each employee is responsible for all actions and functions performed on their account(s). Suspected password compromise must be immediately reported to the assigned supervisor.

Passwords do not create an expectation of privacy. PAVIR may access or override password-protected systems when necessary for legitimate business purposes.

Violations of security and confidentiality rules may lead to disciplinary action up to termination.

Social Media

PAVIR has established guidelines for social media use when employees' activities may involve or implicate the organization. This applies when posting about PAVIR, engaging with social media during work hours, or using PAVIR resources for social media activities.

Rules for Social Media Participation:

- Follow all laws and regulations while engaging in social media activities.
- Avoid discriminatory, harassing, or retaliatory conduct (PAVIR's policies against discrimination, harassment, and retaliation apply to the use of PAVIR's Property & Information).
- Respect copyright and fair use, including providing proper citations.
- Protect PAVIR's confidential and trade secret information.
- Personal social media activities should not interfere with job duties and must not use PAVIR email addresses to register on social media websites, blogs, or other online tools utilized for personal use.
- Employees should not post false or misleading information about PAVIR, its employees, or collaborators.
- Do not act as a PAVIR spokesperson without authorization.

PAVIR monitors its resources and activities, including social media usage, and employees should have no expectation of privacy when engaging in social media use while at work or for PAVIR-related purposes.

Nothing in this policy is intended to prohibit you from discussing the terms and conditions of employment with your co-workers or engaging in concerted activities pursuant to the NLRA and other applicable laws.

Employee-Owned Devices

PAVIR recognizes that employees may occasionally use personal devices (e.g., phones, computers) for personal reasons at work, provided that the usage does not disrupt work performance or violate any PAVIR policy.

If a personal device is needed for work purposes, employees should notify HR prior to engaging in such use.

Parking/Off-Duty Use of Facilities

Employees must adhere to VAPAHCS parking guidelines. Parking areas designated for patients, visitors, or vendors are off-limits to employees. PAVIR is not responsible for any loss or damage to vehicles or contents while parked on VAPAHCS property.

Parking areas may be monitored by video surveillance or other means. However, this surveillance is not intended to provide personal security for employees.

Values and Employee Conduct

Values

PAVIR is aware of its responsibility to uphold the highest standards of professional conduct and practice in relation to its research and research administration activities. PAVIR values present standards of behavior to which employees should aspire and is based on our CREDO, which represent our five key values.

PAVIR trusts that its values will be a source of support and confidence to PAVIR's research community, including sponsors, donors, employees and collaborators, and is a source of reassurance to those who participate in our research projects. These ethics will apply to all PAVIR employees and consultants who engage in research administered by PAVIR.

Creativity and Innovation

- Challenge yourself to constantly ask “how can this be done better?”
- Implement new technology, ideas, and processes to better embrace our purpose
- Respect the process, but dare to embrace innovation

Ethical Standards

- Respect the needs for privacy and security, including record retention, in accordance with the law
- Conduct yourself with integrity and respect, as well as sensitivity to people's needs
- Address discrimination, untruthful presentation of data/work performance, or libel with supervisors and/or Human Resources
- Give credit to others as appropriate in proportion to the professional contribution that they have made

Excellence – Results

- Develop your professional standing and keep current with new relevant knowledge and new developments through the reading of relevant literature, peer consultation, and continuing education activities
- Communicate knowledge, experience and views while clearly differentiating facts, opinions, habits, and ideas
- Be the colleague with whom you want to work

Compliance

- Engage only in approved and compliant research and education activities
- Respect compliance parameters stemming from Federal and State law, as well as funding agencies and project specific regulations

Financial Stewardship

- Act as a steward of PAVIR's funds, entrusted to us by our sponsors
- Reimburse and ask for reimbursement of only allowable and reasonably necessary expenses
- Seek balance between cost of materials and services, labor, and time

Confidentiality

All employees are expected to exercise sound judgment and discretion in handling confidential information obtained through their work. Safeguarding confidential information is an ongoing condition of employment.

Employees must access, use, and disclose confidential information only as necessary to perform their assigned job duties and only when authorized to do so. Confidential information may not be shared internally or externally except on a legitimate business “need-to-know” basis and in accordance with applicable law and PAVIR policy.

Employees are responsible for taking reasonable precautions to protect confidential information from unauthorized access, disclosure, alteration, or destruction. This includes maintaining physical and electronic security, following data protection requirements, and promptly reporting any suspected breach or unauthorized disclosure.

Employees who have access to VA or patient information are subject to additional legal and regulatory requirements, including but not limited to HIPAA and applicable VA confidentiality rules. Such employees must comply with all applicable federal laws, VA directives, and institutional policies governing the protection of sensitive information.

Failure to comply with these obligations may result in disciplinary action, up to and including termination of employment, and may also expose the employee to civil or criminal liability where applicable.

Conflict of Interest/Ethics

PAVIR employees are expected to conduct business according to the highest ethical standards, avoid situations that could lead to a conflict of interest, and devote their best efforts to the interests of PAVIR. All employees must avoid situations involving actual or potential conflicts of interest. While it is impossible to specify every action that might create a conflict, the most common scenarios are outlined below:

- **Outside Employment/Directorship/Political Office** – Outside employment is generally prohibited if it prevents employees from fully performing their duties at PAVIR, involves organizations doing business with PAVIR (including potential or existing vendors), raises any ethical or conflict of interest concerns, or violates law or PAVIR policies. In the event of a conflict with outside employment, obligations to PAVIR must take priority.
- **Personal/Romantic Involvement** – Personal or romantic relationships with a vendor, sponsor, subordinate employee, or situation where one employee directly or indirectly supervises, evaluates, influences employment decisions regarding, or exercises control over the terms and conditions of employment of another employee, may create a conflict of interest by impairing an employee’s judgment or creating supervisory issues. See also ‘Employment of Relatives.’
- **Personal/Financial Interest in Other Business** – Employees and their immediate family cannot own significant interests in vendors or suppliers of PAVIR unless the interest consists of publicly traded securities. Employees should not maintain business relationships with vendors where they influence PAVIR’s relationship with that vendor.
- **Acceptance of Gifts** – Employees may not solicit gifts from vendors, sponsors, collaborators, or other persons or entities doing business with PAVIR. Unsolicited gifts with a value of \$20 or less per occasion may be accepted, provided that the total value of gifts received from the

same source does not exceed \$50 in a calendar year. Cash or cash equivalents may not be accepted. Employees serving in a VA capacity, including those with a VA Without Compensation (WOC) appointment or IPA detail, must comply with applicable federal ethics rules, which may impose additional restrictions. Gifts exceeding applicable limits must be politely declined or returned with an explanatory note.

Additional guidelines include:

- **Improper Use of PAVIR Name/Equipment** – Employees may not use PAVIR’s name, property, or equipment for personal gain.
- **Conducting Personal Business** – Employees should conduct PAVIR-related work during work hours and not engage in personal business during working hours.
- **Unauthorized Sharing of Confidential Information** – Employees may not use information gained during employment for personal or familial benefit.
- **Preferential Treatment** – Employees cannot seek preferential treatment or recognition for themselves or others.

Employees must also adhere to VAPAHCS Conflict of Interest disclosure requirements for PAVIR-administered research projects.

Request by Third Parties for PAVIR Information

Employees may be approached for interviews or comments by the news media or a third party. Only individuals designated by the CEO may comment to news reporters on PAVIR policy or events relevant to PAVIR.

This policy does not limit an employee’s right to discuss the terms and conditions of their employment or to try to improve these conditions.

Business Conduct

The manner in which employees conduct themselves should create a favorable and lasting impression of PAVIR. The continued success of PAVIR depends on the quality, integrity, expertise, and professionalism of PAVIR employees.

All employees should present themselves in a professional and efficient manner, including in written communications. Employees should provide prompt, accurate, and courteous attention and a helpful and meaningful response to co-workers and others needing assistance. Individuals who visit PAVIR must always be treated with respect, tact, and courtesy.

Responsible Use of Artificial Intelligence in the Workplace

PAVIR is committed to the responsible and trustworthy use of artificial intelligence (AI) in research to improve clinical care, enhance administrative efficiency, and personalize medicine for Veterans. The following list is illustrative of the general usage guidelines PAVIR employees are expected to follow:

- Disclose all work-related use of AI and properly attribute it when necessary
- Do not present AI-generated content as one’s own original work

- Do not input any confidential, proprietary, or sensitive PAVIR or VA data into public AI tools
- Review, verify, and correct AI-generated content before use in PAVIR or VA purposes
- AI may be used to assist in employment-related decisions, but must not result in discrimination based on any protected characteristics (i.e., race, gender, religion, disability, or national origin; see Anti-Discrimination Policy for full list))
- AI use must comply with all federal, state, and local laws and regulations
- Report any misuse of AI or concerns about AI-related discrimination to supervisors or PAVIR HR

Dress Code and Grooming Standards

Employees are expected to maintain a professional appearance appropriate to their work environment, including VA facilities, research settings, and administrative offices. Clothing must be neat, clean, and appropriate for the duties being performed.

Employees may not wear attire that is unsafe, disruptive to the work environment, or that contains obscene, threatening, discriminatory, or harassing language or imagery.

Supervisors may establish additional safety-related or site-specific requirements consistent with this policy and applicable law.

Neat and tidy grooming and personal cleanliness is expected of all employees. Clothing should be clean and free from odor. In addition, employees are asked to exercise moderation when using perfumes, colognes, and hair spray, as there are individuals who have allergies and sensitivities to certain chemicals and scents.

Reasonable accommodation will be made for employees per PAVIR's EEO policy.

Off-Duty Conduct

PAVIR does not interfere with the lawful off-duty conduct of employees but will take disciplinary action if off-duty conduct conflicts with PAVIR's business interests or disrupts operations to the extent permitted by law.

Political Activity

Employees may engage in political activities on their personal time, but PAVIR's time, resources, or equipment cannot be used for political activities. Employees may not seek reimbursement for political contributions or imply PAVIR's endorsement of political candidates.

Solicitation and Distribution of Literature

No employee shall solicit or promote support for any cause or organization or distribute or circulate any written or printed material in work areas at any time or during their working time, or during the working time of the employee or employees at whom such activity is directed. As used in this policy, working time excludes meal and break periods and working areas excludes designated meal and break rooms.

Under no circumstances will non-employees be permitted to solicit or distribute written material for any purpose in PAVIR work areas.

All employees are expected to comply strictly with these rules. Nothing in this section is intended to prohibit or restrict employees from exercising their rights under the NLRA, which includes discussing their wages and working conditions. Any employee who is in doubt concerning the application of these rules should consult with their supervisor or PAVIR HR at hr@pavir.org.

Prohibited Conduct

The following conduct is prohibited and will not be tolerated by PAVIR. This list is illustrative and does not cover all possible misconduct. Other conduct that threatens safety, integrity, compliance, or business operations may also result in disciplinary action, up to and including termination.

- Falsification of Records or Information – Falsifying, omitting, or misrepresenting material information in employment applications, background check documents, timecards, payroll records, leave documentation, research records, grant documentation, compliance records, or any other PAVIR-related records. This includes making false statements or omitting material information during the hiring process and falsifying documents used to verify identity or authorization to work in the United States, including Social Security numbers or other employment eligibility documentation.
- Research or Compliance Misconduct – Fabrication, falsification, misrepresentation, or improper handling of research data, regulatory submissions, grant documentation, compliance records, or other research-related materials.
- Failure to Perform Duties – Unsatisfactory performance, neglect of assigned duties, or refusal to perform legitimate job responsibilities.
- Timekeeping Fraud – Recording work time for another employee, allowing another employee to record your time, falsifying time records, or failing to accurately report hours worked.
- Theft or Damage – Theft, misappropriation, or deliberate or careless damage to PAVIR property or to the property of employees, collaborators, vendors, sponsors, or other third parties.
- Misuse of PAVIR Property or Resources – Unauthorized use or misuse of PAVIR property, resources, time, equipment, systems, or facilities.
- Unauthorized Recording – Recording audio or video in secure areas or without required authorization.
- Workplace Violence or Disruptive Conduct – Provoking or engaging in fights, threatening behavior, intimidation, or other conduct that disrupts business operations.
- Possession of Weapons – Possessing firearms or other dangerous weapons on PAVIR premises or while conducting PAVIR business, except as permitted by law.
- Criminal Conduct – Engaging in criminal conduct that affects job performance, workplace safety, or PAVIR's business interests.
- Insubordination – Refusal to follow lawful and reasonable instructions from a supervisor or member of management.
- Abusive or Threatening Conduct – Using abusive, threatening, harassing, or intimidating language or behavior.

- Unreported Absences – Failure to report to work for three consecutive scheduled workdays without notice or valid excuse, unless otherwise protected by law.
- Failure to Report Injury – Failure to promptly report a work-related injury or illness.
- Failure to Observe Work Schedules – Failure to follow established work schedules, including meal and rest period requirements.
- Sleeping or Neglect of Duties – Sleeping during work hours or failing to remain attentive to assigned responsibilities.
- Unauthorized Overtime – Working overtime without required prior authorization or refusing assigned overtime when required.

This statement of prohibited conduct does not alter PAVIR's policy of at-will employment.

Health, Safety, and Security

Safety and Accident Prevention

It is PAVIR's goal to provide a safe and healthy work environment. Meeting this goal depends upon the safety awareness and cooperation of all employees. PAVIR expects employees to observe the following safety rules:

- Learn the job and applicable safety practices before performing assigned duties.
- Wear required Personal Protective Equipment (PPE) when performing job duties.
- Use safety equipment and devices properly.
- Exercise reasonable care in performing assigned duties to avoid creating unsafe working conditions.
- Become familiar with emergency exits and evacuation procedures at the work location.
- Learn the location of fire extinguishers and follow emergency instructions when applicable.
- Promptly report all unsafe or potentially hazardous conditions to management.
- Use proper lifting techniques and request assistance when needed.
- If job duties involve driving, maintain current automobile insurance, wear seat belts, avoid unsafe driving practices, and do not use a handheld device while operating a vehicle in violation of law.
- Report all work-related injuries or illnesses to the assigned supervisor immediately.

PAVIR is committed to maintaining workplace safety in accordance with applicable federal and state law. Safety procedures and practices may be communicated through written guidelines, training, and operational protocols. As PAVIR develops and updates its formal safety procedures, employees will be informed accordingly.

Many PAVIR employees work in VA facilities or hold a VA Without Compensation (WOC) appointment or IPA detail. In such settings, employees must also comply with applicable VA safety rules, directives, and workplace safety requirements. Where VA policies apply, those requirements must be followed.

Computer Workstation Ergonomics

PAVIR strives to provide an ergonomically safe workstation for all employees, but each employee is also responsible for working at their computer with ergonomic safety in mind. Employees are asked to follow the following ergonomic practices, including while telecommuting or remote work or remote work:

- Adjust the height of their chair and work surface to a level that is comfortable. The chair height should allow for the feet to be flat on the floor and the thighs to be parallel to the floor.
- Position the monitor so the top of the screen is at the same level or slightly below the eyes.
- Adjust the keyboard height so the upper arms are relaxed at the sides, wrists and hands are straight, and forearms are parallel to the floor.
- Avoid long reaches and move frequently accessed items so they are within easy reach.
- Avoid tilting/turning your head for extended periods of time.
- Take periodic rest breaks to stretch and redirect eye focus.

Reporting Workplace Accidents and Safety Concerns

Employees must promptly report all work-related accidents, injuries, illnesses, potential safety hazards, safety suggestions, and other health or safety concerns to their supervisor and PAVIR Human Resources.

This reporting requirement applies regardless of work location, including while working:

- At a VA or other external facility
- At a PAVIR-supported site
- In the field
- From a remote or home work location

If an injury requires immediate medical attention, the employee should contact appropriate local emergency resources (such as 911) based on the employee's physical location at the time of the incident. Once safe to do so, the employee must notify their supervisor and HR as soon as possible.

PAVIR Human Resources (hr@pavir.org) must be notified within 24 hours of any work-related accident, injury, or illness. PAVIR Human Resources will periodically provide employees with updated contact information and reporting instructions to ensure timely and accurate reporting of workplace injuries and safety concerns.

If medical treatment is sought or recommended, an Employee's Claim for Workers' Compensation (DWC-1) form must be completed in accordance with applicable law. If medical treatment is not required, the incident must still be reported so that it may be documented as a report-only event and any potential hazards may be evaluated and addressed.

Injuries sustained while performing job duties in a remote or home work location must also be reported promptly. Workers' compensation coverage may apply only to injuries arising out of and in the course of employment, as defined by law.

PAVIR maintains records of work-related illnesses and injuries as required by applicable federal and state law. Employees are required to report workplace injuries and illnesses, regardless of severity. Failure to timely report a work-related injury may affect eligibility for workers' compensation benefits.

Employees are encouraged to raise any safety questions or concerns with their supervisor or Human Resources at any time.

In compliance with California law and to promote the concept of a safe workplace, PAVIR maintains an Injury and Illness Prevention Program (IIPP) which is available for review by employees and/or employee representatives. Contact Human Resources if you wish to review the IIPP or if you have any questions concerning this policy.

Smoking

In keeping with PAVIR's intent to provide a safe and healthy work environment, smoking is prohibited throughout the workplace. This policy covers the smoking of any tobacco product and the use of oral tobacco products, "spit" tobacco, nicotine and non-nicotine cigarettes including herbal cigarettes and marijuana, cigars, pipes, e-cigarettes, and vaporizers, and it applies to both employees and non-employee visitors, collaborators, contractors, and consultants of PAVIR.

Emergency Measures

At times, emergencies such as severe weather, fires, power failures, or earthquakes, can disrupt PAVIR operations. In extreme cases, these circumstances may require PAVIR to close the office. If weather conditions prevent an employee from safely traveling to work, the employee should contact their supervisor immediately.

Employees shall not be prohibited from accessing their mobile device or other communication device for seeking emergency assistance, assessing the safety of the situation, or communicating with a person to confirm their safety during an emergency condition. An emergency condition means: (i) conditions of disaster or extreme peril to the safety of persons or property at the workplace or worksite caused by natural forces or a criminal act; or (ii) an order to evacuate a workplace, a worksite, a worker's home, or the school of a worker's child due to natural disaster or a criminal act.

Guests and Visitors

Visits from friends and family are to be kept to a minimum to preserve a safe and appropriate work environment. It is important that the impression left with PAVIR visitors is that of a professional organization with the highest standards of conduct.

Housekeeping

All employees are expected to keep their work areas clean and organized. People using common areas such as lunch rooms, locker rooms, and restrooms are expected to keep them sanitary. Please clean up after meals and dispose of trash properly.

Security

PAVIR has developed guidelines to help maintain a secure workplace. PAVIR expects employees to participate in maintaining a secure workplace:

- Be aware of persons loitering for no apparent reason in parking areas, walkways, entrances and exits, and service areas.
- Report any suspicious persons or activities to VA security personnel and PAVIR HR.
- When called away from the assigned work area for an extended length of time, do not leave valuable and /or personal articles in or around the assigned workstation that may be accessible. Always log off when leaving your work area to keep computer-based information secure.
- Notify the supervisor when unknown persons are acting in a suspicious manner in or around the facilities, or when keys, security passes, or identification badges are missing.

The security of facilities as well as the welfare of employees depend upon the alertness and sensitivity of every individual to potential security risks.

Termination

Employment Termination

Since employment with PAVIR is at-will, both the employee and PAVIR have the right to terminate employment at any time, with or without cause, and with or without advance notice. The two most common circumstances under which employment is terminated are:

- Voluntary employment termination initiated by the employee.
- Involuntary employment termination initiated by PAVIR.

If an employee wishes to terminate their employment with PAVIR, the employee is requested to submit a resignation letter indicating the reason for leaving via email to their supervisor and HR with as much advance notice as possible, preferably at least two weeks.

Except as otherwise provided by law, an employee who fails to report to work for three or more consecutively scheduled workdays without notice to, or approval by, their supervisor will, in most cases, be deemed to have voluntarily resigned from their employment.

Exit Interviews

PAVIR HR will seek feedback via exit interviews at the time of termination. The exit interview will provide an opportunity to give input. Suggestions, complaints, and questions can also be brought up confidentially.

Return of Property

All PAVIR-owned property, including all PAVIR information in any form, credit cards, VA keys, uniforms, and identification badges, must be returned immediately upon termination of employment. PAVIR reserves the right to take all actions deemed appropriate to recover or protect its property.

Final Pay

Employees will receive their final pay in accordance with applicable law. Upon termination of employment, employees will be paid for their actual hours worked in the pay period and for all accrued but unused vacation hours. Sick time balances are not paid out.

Continuation of Health Coverage

Federal law generally requires employers with 20 or more employees to give employees, spouses, and dependent children the right to continue group health benefits for limited periods of time under certain circumstances, such as voluntary or some types of involuntary job loss, reduction in hours worked, death, divorce, and other life events. Under federal law, employees ordinarily may continue their health coverage for up to 18 months when their employment is terminated. Applicable state law may provide additional coverage. Employees are encouraged to refer to the applicable sections of the benefits section of this handbook.

Employee References

Employment information regarding past or present employees of PAVIR is confidential and should not be communicated by PAVIR to anyone who does not have a legitimate interest in the information. Therefore, all employment reference inquiries regarding past or present employees must be directed to hr@pavir.org. No one outside of the HR Department is authorized to respond to such requests.

By policy, PAVIR discloses only the dates of employment and the title of the last position held of former employees.

VA Non Profit Corporation (NPC) Non-Disclosure Agreement Confirmation

FOR GOOD CONSIDERATION, and in consideration of being employed by the Palo Alto Veterans Institute for Research (PAVIR), a nonprofit corporation created under state law of California to serve as a flexible funding mechanism for VA-approved research and education pursuant to 38 U.S.C. §§ 7361-7366, the undersigned employee hereby agrees and acknowledges the following:

1. During the course of my employment, there may be information disclosed to me that may be considered confidential information. This information includes, but is not limited to:
 - a. VA patient and employee information, including but not limited to: personnel files, credentialing and licensure files, VA research or other records protected by the Privacy Act (5 U.S.C. § 552a), the Health Insurance Portability and Accountability Act of 1996 (Public Law 104-191), or other federal laws, such as 38 U.S.C. §§ 5701, 5705, and 7332.
 - b. Trade secrets, commercial, financial and other confidential information from third parties, such as for-profit and nonprofit business entities, academic affiliates, public and private foundations, and government agencies, obtained during discussions or engagements in collaborative research with VA. Other confidential information may consist of but not necessarily be limited to:
 - i. Technical information: Methods, processes, formulae, compositions, systems, techniques, inventions, machines, computer programs and research projects
 - ii. Business information: Customer lists, pricing data, sources of supply, financial data and marketing, production, or merchandising systems or plans.
 - c. PAVIR's internal information of a confidential nature, such as budget, personnel, and information related to internal business operations matters, etc.
2. During or at any time after the termination of my employment with PAVIR, I shall not use for myself or others, or disclose to others, any confidential information of VA, external third party, or PAVIR in violation of this agreement.
3. PAVIR reserves the right to take disciplinary action, up to and including termination, for my violations of this agreement.
4. I am not under any preexisting obligations inconsistent with the provisions of this Agreement.
5. Upon the termination of my employment from PAVIR:
 - a. I shall return all documents and property obtained by me in the performance of my duties to PAVIR. I further agree that I shall not retain copies, notes, or abstracts of the foregoing, unless specifically allowed by VA rules and regulations. Investigators who are employed by the NPC are encouraged to check with their local VA Research Services for applicable rules and regulations.
 - b. PAVIR may notify any future or prospective employer or third party of the existence of this agreement, and shall be entitled to all remedies including injunctive relief for any breach.

6. PAVIR employees may either hold a VA Without Compensation appointment or be detailed to the VA via the Intergovernmental Personnel Act (IPA) Mobility Program and are also subject to various laws regarding confidentiality, including but not limited to the Privacy Act, Freedom of Information Act, 38 U.S.C. §§5701, 5705, and 7332. VA employees may only use or disclose confidential information consistent with applicable authorities. Requests for disclosure of confidential information will be handled in accordance with 5 U.S.C. §552, E.O. 12600, and 38 C.F.R. 1.554a. Additionally, VA employees, including PAVIR employees who hold a WOC appointment, are bound by 18 U.S.C. § 1905, known as the Federal Trade Secrets Act, to not disclose confidential and proprietary information disclosed to them in the conduct of their official duties. Additionally, the Economic Espionage Act of 1996 makes the theft or misappropriation of a trade secret by VA employees a federal crime. 18 U.S.C. §§ 1831-1839.
7. This agreement shall be binding upon me, my personal representatives, and any successors in interest, and shall inure to the benefit of PAVIR NPC, its successors and assigns.

Signed this _____ day of _____ 20 _____

PAVIR Employee Signature

PAVIR Employee Printed Name

Acknowledgment of Receipt – PAVIR Employee Handbook

I have received a copy of the Palo Alto Veterans Institute Research (PAVIR) Employee Handbook. I understand and agree that it is my responsibility to read and familiarize myself with the policies and procedures contained in the handbook, and I agree to follow the policies stated therein.

I understand and agree that nothing in the employee handbook creates or is intended to create a promise or representation of continued employment and that employment at PAVIR is employment at-will and that PAVIR and I both have the right to terminate my employment at any time, with or without notice, and with or without cause. Employment may be terminated at the will of either PAVIR or me. My signature certifies that I understand that the foregoing agreement on at-will status is the sole and entire agreement between PAVIR and me concerning the duration of my employment and the circumstances under which my employment may be terminated. It supersedes all prior agreements, understandings, and representations concerning my employment with PAVIR.

I understand that except for employment at-will status, any and all policies or practices can be changed at any time by PAVIR and that PAVIR reserves the right to change my hours, wages, and working conditions at any time. I understand and agree that no Principal Investigator, supervisor, or representative of PAVIR has authority to enter into any agreement, express or implied, for employment for any specific period of time, or to make any agreement for employment other than at-will; only the CEO and the PAVIR Board of Directors have the authority to make any such agreement and then only in writing, signed by the CEO or a representative of the PAVIR Board of Directors, and me.

Employee Signature:

Employee Printed Name:

Date:
