



ONEIDA INDIAN NATION

Employee Guidebook

Professional Services



Ray Halbritter
Chief Executive Officer and Oneida Indian Nation Representative

Welcome to the Oneida Indian Nation. We are pleased that you have chosen to be a part of our Team.

We recognize that every employee makes an important contribution to the continuing success of the Oneida Indian Nation. Our Nation is experiencing a long-in-coming renaissance that is a premier example of how Indian people can improve economically, strengthen politically and revitalize culturally. Our Nation's enterprises are a key component in this renaissance and demonstrate the Nation's commitment to quality, excellence and sound business practices. As an employee, you are a part of the great awakening, excitement and invigoration that the Nation is now experiencing.

We invite you to embrace the cultural values by which the Nation lives and to fully participate in the continuing commitment to excellence that makes us the workplace and destination of choice of Central New York.

Again, welcome and thank you. May we have a long and pleasant association together.

A handwritten signature in black ink that reads "Ray Halbritter". The signature is written in a cursive style with a long, sweeping underline.

Na ki' wa

Ray Halbritter
Chief Executive Officer
and Oneida Nation Representative

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Icons of the Oneida Indian Nation

Symbols in the Oneida Nation Seal

The seal of the Oneida Indian Nation represents the core elements of our culture and traditions.



The eagle sits in the top of the tree, keeping a sharp eye out for any danger that might threaten the Haudenosaunee or any of its members.

The centerpiece is the Tree of Peace, said to be a great white pine tree, which was planted when the Peacemaker came to visit our people and bring the good message of peace, power, and righteousness.



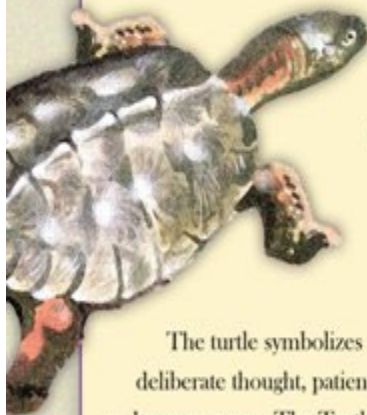
The white roots spread in all four directions so that people of good will might follow them back and come under the tree's protection.



The wampum belt represents the Six Nations of the Haudenosaunee, also known as the Iroquois Confederacy, which buried their weapons under the Tree of Peace many generations ago.

The Turtle, Wolf and Bear Clans of the Oneida Nation are protected in the limbs of the Tree of Peace.

Characteristics of the Clans



The turtle symbolizes deliberate thought, patience, and perseverance. The Turtle Clan is seen as strong, loyal, wise, and well-respected.

The wolf symbolizes leadership and vision. The Wolf Clan has a strong sense of family and is considered to be alert and watchful.



The bear symbolize gentleness and strength. The Bear Clan is attuned to spiritual well-being and medicinal healing.

The Oneida Way

The vision of the Oneida Indian Nation and its many enterprises has developed, and will continue to flourish, as a result of our commitment to the core values of this organization. We encourage all employees to embrace “The Oneida Way”.

THE ONEIDA WAY

- Honesty is the only policy. Our word is our bond and we must always treat people with honor and respect.
- We stress good human relations as being essential to good business practices.
- We are straightforward in our relationships. We always listen and expect the same in return.
- If we disagree with someone's ideas and philosophies, we do so politely and without being disagreeable.
- We share in the pride of the Oneida People and are always sensitive to their cultural heritage, history and traditions.
- We value loyalty and hard work and do everything we can to ensure that fair treatment and cultural sensitivity are by-words.

Oneida Indian Nation Mission Statement

The People and the leadership of the Oneida Indian Nation have identified three principal long range goals to guide the community and economic development activities of the Nation, administration, and leadership of the Nation. These long range goals of the Oneida Indian Nation are as follows:

- Help our Oneida members achieve their highest potential in education, physical and mental health, and economic development
- Implement the legal and administrative structure for the stability and protection of Nation sovereignty, treaty rights and government to government relationships
- Acquire, develop, and secure resources to achieve economic and social empowerment and self-sufficiency for the Oneida Indian Nation

These long range goals have been adopted by the Nation as a guide towards the accomplishment of a progressive dream. Simultaneously, the Nation plans to use the economic incentives available to a sovereign Nation to inject new wealth and create jobs for the Oneida Indian Nation community and, significantly, the surrounding communities.

Our Commitment to the Oneida Way

As many of you know, the Oneida Indian Nation is invested in the principles of the Oneida Way, which is also a value system that employees follow every day. The Oneida Way has provided a strong platform for how we should behave, communicate and provide service to our guests and each other. This value system is built on honesty, trust, integrity, loyalty, pride and hard work. The Oneida Way has helped guide all Nation employees to being our very best at work. This sense of shared purpose, teamwork and commitment has resulted in dozens of awards for excellence across our operations and businesses and helped to ensure a stable work environment with tremendous opportunities for career growth for our employees.

The Nation is committed to treating our employees with respect and dignity and to providing excellent benefits, optimum working conditions and competitive wages. We know that employees may need to express their concerns, suggestions and comments so that we can know and understand each other. You can and should speak for yourself. Our leaders are held accountable for listening and ensuring open communication.

A direct relationship between our employees and managers ensures the best environment for achievement of individual and organization goals. This direct relationship is why we feel strongly about maintaining a workplace free of unions, and other third parties. While we recognize the right of employees to join or not join a labor union, we will resist any effort made to interfere with our relationship with our employees. We will constantly strive to maintain a culture in which our employees are comfortable coming to us with their issues and concerns knowing that they will be handled with care, respect, consistency and fairness.

Our ability to communicate effectively and directly with our employees is one of the most important aspects of our employee relations philosophy.

Core Service Standards

- **Professional Image:**
Our image is professional in appearance, behavior and forms of communication.
- **Organizational Pride:**
We take pride in our work, our employer and our team and share our pride with those we serve, our co-workers and the community.
- **Learn More:**
We take opportunities to learn more about those we serve and suggest other Nation operations and services to meet their needs.
- **Issue Warm Greeting:**
We greet everyone we serve with a smile, eye contact and verbal acknowledgement.
- **Sincere Send-Off:**
We extend appreciation for the opportunity to serve. We offer thanks and extend an invitation for them to return.
- **Handle With Care:**
We always offer assistance and customize our service to meet and exceed expectations.

History of the Oneida People

Few realize, and history has failed to accurately record, the role the Oneida People played in the formation, success, and progress of the United States of America. Once, the Oneida People were powerful, respected members of the Six Nation Iroquois Confederacy. They were agriculturists and traders with a skill for commerce, a willingness to share, and a special consideration for their neighbors. They were occupants and guardians of six million acres of Mother Earth before the Revolutionary War.

First allies to George Washington, the Oneidas were the only Indian nation who fought and died with the American colonists during the Revolutionary War. In fact, the Oneidas hiked hundreds of miles on foot in winter to Valley Forge, carrying 600 bushels of corn to feed Washington's starving troops. Washington thanked the Oneidas following the war by signing treaties of peace with them. These 200 year old agreements form the basis of the Oneida Indian Nation's inalienable status as a sovereign nation.

Today, the Oneida Indian Nation is in the midst of a long deserved and exciting renaissance. The Oneida People are now being recognized for their successful efforts to reclaim a nearly lost culture and are respected as full partners and leaders in the local region's economic recovery and prosperity. The Oneidas are reacquiring ancestral lands, reinstating the ways of generations past, and reestablishing the Oneida language and culture.

Reversing years of frustration, the Oneida People are lifting themselves out of the depths of despair and creating new hope and direction. This is the revitalization of strong proud people who bring with them new opportunity for all.

The Oneida Indian Nation currently offers a three-phase approach to language reclamation. The first phase is a series of three separate adult language classes. The second phase involves the Nation's Early Learning Center which incorporates the Oneida language as part of the curriculum and the third phase of the program lies in the technological field, which has developed and continues to develop on-line resources and applications to support the learning process.

Simple Phrases:

shekólih	Hello
ná ki' wáh	Good-bye
oh niyohtháti'	How are you (literally : how's it going (along))

Description of Nation Divisions, Operations & Enterprises

The Oneida Indian Nation is the largest employer in Madison and Oneida counties and one of the top employers in the 16 counties comprising Central New York. The Oneida Indian Nation’s entity, Oneida Nation Enterprises, LLC (“ONE”), is the employer for the Oneida Indian Nation’s operations and enterprises. The Oneida Indian Nation’s operations are generally divided into three divisions: Government, Business Operations and Support Services. Each of these divisions has a separate Guidebook. While these Guidebooks are very similar, there are slight variations to policies and standards in order to address the unique nature of each division. A general description of each division is as follows:

Government: Government departments are generally responsible for providing services that support the Nation’s exercise of its self-governance as well as providing services directly to Nation Members.

The success of these programs allows the Nation to provide many services to Oneida Members. Some of those services include:

- A comprehensive health clinic--open to all American Indians
- Educational scholarships and tuition assistance programs--everything from preparatory schools to post-doctoral work
- The Ray Elm Children and Elders Center—the centerpiece of the Village of the White Pines and home to a variety of programs targeted for these key populations
 - A congregate meals and enrichment program for Nation Elders
 - An Early Learning Center, an accredited day care facility for members as well as children of employees
- A multi-faceted recreation and youth development program
- Continuing cultural education initiatives—including Oneida language and dance classes
- Shako:wi Cultural Center - offers visitors an in depth look at the Oneida Indian Nation - filled with items and stories from the rich past and present of the Oneida People
- The Village of the White Pines—a residential community
- Oneida Indian Nation Police – an experienced and professionally trained law enforcement agency dedicated to preserving the peace, protecting property, preventing and detecting crime, and enforcing federal, state, and Oneida Indian Nation Laws and ordinances

Business Operations: Business Operations include the Nation’s commercial entities and operations and those departments that provide support exclusively to those entities and operations. These operations include:

Turning Stone Resort Casino

Turning Stone Resort Casino offers world-class golf, spas, gaming, fine dining, entertainment and nightlife, accommodations and a sportsplex. Since opening in 1993, Turning Stone has become one of the top five tourist destinations in New York State, attracting more than 4 million visitors a year.

- Gaming – Turning Stone's expansive full-service casino offers round-the-clock gaming excitement at both classic games of chance and today's most popular specialty games. Guests may try their luck at table games, slot machines, Keno, Bingo, Poker and Sports Betting. The Oneida Indian Nation Bingo Hall is New York's largest bingo hall and has been rated one of the top 5 Bingo Halls in the world.
- “Exit 33” – An entertainment complex that includes five entertainment venues – The Gig, a rock and roll club, The Tin Rooster, a BBQ restaurant and country dance hall, The Atrium Bar, a lounge featuring a sushi menu, Turquoise Tiger, a sophisticated lounge straight out of the 1940’s film noir.
- Hotel and Tower at Turning Stone
The Hotel at Turning Stone Resort Casino is one of the largest hotels in Central New York with 276 rooms, including special amenities such as Jacuzzi suites, patio suites, outdoor terraces and indoor balconies overlooking the hotel’s dramatic atrium lobby. At 19 stories, the Tower at Turning Stone is the tallest building between Albany and Syracuse. The Tower hotel features 287 well-appointed guest rooms, junior suites and spacious elegant suites. The Tower has the distinction of receiving a 4-Diamond rating from the AAA, signifying its outstanding amenities and commitment to service.
- The Lodge at Turning Stone
The Lodge at Turning Stone is an elegant all-suite hotel adjacent to the Shenendoah Clubhouse at the Turning Stone Resort Casino. With its expansive yet intimate design and elegant appointments, The Lodge sets a standard of service and comfort never before available in Central New York. Each suite includes a separate living room and bedroom and choice amenities such as flat screen TVs, high-speed Internet access and in-room safes and refreshment centers. At the heart of The Lodge, guests will find a relaxing Great Room with a majestic two-story fireplace and The Lodge Lounge, sitting perfectly aligned with a wall of windows that look west onto the Great Lawn. The bar, made of quartz and locally-sourced Cherrywood, provides ample space for guests to spread out and relax. Wildflowers, an elegant, intimate restaurant features traditional American fare. Both the Lodge and Wildflowers have received the Forbes 4-Star distinction.

- **SkΛ:nΛ Spa**
 SkΛ:nΛ, Oneida for “peace,” is a unique luxury destination spa. Attached to the Lodge, it is inspired by the Oneida People's welcoming spirit and their custom of sharing friendship and peace along with their belief in the balance of good health, harmony with nature and tranquility within. Natural woods, stone, trickling water, fireplaces and authentic Oneida artwork inspire an atmosphere of natural calm where guests will feel nurtured, rested and renewed. The SkΛ:nΛ Spa has been consistently honored with the *Forbes Travel Guide 4 Star Award* and has been named the *#1 Spa in North America* by Spas of America.
- **Ahsi Day Spa & Salon**
 Ahsi’, Oneida for “awaken.” Adjacent to the lobby atrium of The Hotel, The Ahsi Day Spa & Salon provides a full range of treatments and amenities emphasizing natural elements to revive the spirit, nourish the skin and soothe the soul. Guests may also enjoy the steam room, sauna, whirlpool, and access the Hotel indoor swimming pool.
- **The Inn at Turning Stone**
 The most moderately priced of the hospitality alternatives offered at Turning Stone, the Inn at Turning Stone offers 62 rooms, a continental breakfast and free shuttle service to and from the resort. The Inn is conveniently located just minutes from the resort at the corners of Routes 365 and 31 in Verona.
- **Sandstone Hollow Inn**
 Located on the edge of picturesque Sandstone Hollow Golf Course, this modern, affordable, smoke-free, dog-friendly hotel is just a long tee shot from more great golf, outdoor adventures plus exciting casino action at Turning Stone. Guests may enjoy free breakfast, complimentary Wi-Fi and a no-cost shuttle to Turning Stone. Other amenities include guest laundry and a fitness center.
- **The Villages at Turning Stone**
 The Villages at Turning Stone Recreational Vehicle Park is a top-rated Good Sam park located ½ mile from Turning Stone Resort Casino. Each of the 175 paved sites at The Villages includes full utility hookup for water, sewer, cable TV and telephone. Campers can find a variety of recreational opportunities within the park including 2.5 miles of nature trails, a heated pool and Jacuzzi, tennis, volleyball, basketball, horseshoes, paddle boating and a fishing pond. A full service convenience store and on-site laundromat are also available. The Villages at Turning Stone is open mid-April through mid-October.
- **Golf at Turning Stone**
 Turning Stone Resort Casino is one of the premier golf destinations in the Northeast, thanks to its “Triple Crown” of championship-quality courses by top designers Tom Fazio, Robert Trent Jones, Jr., and Rick Smith. Turning Stone also offers executive and recreational courses, Sandstone Hollow and Pleasant Knolls respectively.

- Atunyote
Atunyote (uh-DUNE-yote) is an Oneida word that means “eagle.” It is an 18-hole layout about two and a half miles from Turning Stone, presents a parkland setting with vast stretches of open space, gently rolling hills, a stream and small waterfalls, and several lakes. Atunyote, designed by Tom Fazio, has its own practice facilities, offering a driving range, short game area and putting green.
- Kaluhyat
Kaluhyat (ga-LU-yut) is an Oneida word that means “the other side of the sky.” The course layout is marked by dramatic changes in elevation, measuring as high as 50 feet in some areas, with plateau settings offering seemingly endless, spectacular views of the surrounding terrain. Kaluhyat, designed by Robert Trent Jones Jr., is a classic shot-maker’s course where accuracy and strategy are rewarded as much as length.
- Shenendoah
Shenendoah offers 18 holes of PGA-level golf in a spectacular natural setting. The course layout was built and is maintained to comply with stringent Audubon International standards for environmental protection and preservation. Designer Rick Smith used the natural landscape to create wooded parkland holes, open pastures that capture the links feel, and beautifully simple low country-style holes.
- The Sportsplex and Golf Superstore
Offering an indoor practice area with 40 driving range hitting stations arranged in a double-deck structure, the Golf Dome stands seven stories high and stretches 110 yards long by 80 yards wide. Experience 17,000 square feet of year-round short game practice in addition to our indoor driving range so you never lose your edge. Within the Golf Dome, the Golf Superstore has just about every golf product imaginable, along with precise club-fitting technology and expert club repair services.
- Shopping at Turning Stone
 - The Commons at Turning Stone
The Commons at Turning Stone features 4,500 square feet of boutique shopping, with a mix of both men’s and women’s contemporary fashions and casual wear, stylish jewelry and a diverse selection of accessories. Located in the main entryway of the resort, near the entrance of The Tower hotel, The Commons at Turning Stone will offer guests the latest styles of the season from both national brands and private labels.

- The Shoppes at Turning Stone
The Shoppes at Turning Stone offer a variety of signature stores, which are perfect for guests looking for unique gifts for family and friends, something special for themselves, and even everyday essentials and convenience items – all under one roof. With a mix of affordable fashion accessories, one-of-a-kind American Indian pottery and art, Adirondack-style gifts, tobacco products, gift cards and more, The Shoppes at Turning Stone provide a boutique-style shopping experience in a world-class resort setting.

YBR Casino & Sports Book

YBR Casino & Sports Book, located in Chittenango celebrates the community's connection with the American classic book, "The Wonderful Wizard of Oz." YBR offers guests action-packed fun with Vegas-style cash slot machines, table games, The Lounge with Caesars Sports, casual dining options, bars, a general store, Topgolf Swing Suite and The Lanes at YBR. Open 24 hours, 7 days per week, the interior of YBR is 100% smoke-free.

Point Place Casino

Point Place Casino located in the town of Bridgeport is a smoke-free property featuring an Adirondack-inspired design, slot machines, table games, The Lounge with Caesars Sports, casual dining and cocktail lounge options with live entertainment every weekend. Point Place Casino derives its name from its picturesque location, surrounded by a number of the area's beloved lake points. The venue's ideal setting and its rustic, woodland ambiance mirror the unique spirit and style of Bridgeport and the surrounding community.

The Lake House at Sylvan Beach

For seasonal vacationers and locals alike, The Lake House offers a fresh take on year-round recreation. Combining hot slots, cool sips and rockin' entertainment in an idyllic waterfront setting, The Lake House offers friendly service, a lively social scene, fun slots plus delicious food and drinks that rival the view.

The Cove at Sylvan Beach

This one-of-a-kind hospitality and recreational destination is located at the former Mariner's Landing Marina. Designed for week-long vacations, The Cove features 70 beautifully appointed two- and three-bedroom cottages, each equipped with a pontoon or deck board and a dedicated boat slip, fire-pit, gas grill, kitchen, Wi-Fi and many other amenities. The Cove includes Sylvan Beach Supply Co., the destination's flagship store, and is open for both guests staying at the cottages, as well as daily visitors. Sylvan Beach Supply Co. offers daily rentals of pontoon boats, jet skis, bicycles, paddle boards, kayaks and other watercraft, plus essential beach, fishing and lodging sundry items. The Supply Co. also features a fresh sandwiches, breakfast items, creative ice cream treats, candy, groceries, grab-and-go meals and more.

Marina Properties

The Oneida Indian Nation operates two marinas on Oneida Lake – Marion Manor Marina, located at the intersection of Routes 13 and 31 on the lake’s southeast shore, and Snug Harbor Marina, located on Route 13 just south of Sylvan Beach. These facilities offer a full slate of amenities for boaters including boat slips, launches, indoor and outdoor boat storage, gas, supplies and maintenance services.

SavOn Convenience Stores

The Oneida Indian Nation operates the SavOn chain of gas stations and convenience stores in Oneida and Madison counties. Each location offers a range of convenience food, tobacco products, beer, as well as other essential items. Select locations also feature cash slots.

Maple Leaf Markets

With a focus on providing guests with fresh, made-to-order food, Maple Leaf Market is the next generation of convenience stores that emphasizes healthier grab-and-go meal and snack choices made with fresh ingredients and freshly brewed gourmet coffee. As a tribute to Upstate New York and symbolic of the Nation's profound regional pride, Maple Leaf Market is designed in a rustic-contemporary Adirondack-style.

PlayOn by Turning Stone

Offering the same exciting slot technology as available at our other properties, PlayOn Slot Parlors provide convenient slot gaming, and feature snacks, non-alcoholic beverages, and tobacco products.

Turning Stone Car Care

This state-of-the-art car care center is a one-stop shop for a number of automotive needs. Offering a complete menu of maintenance and repair services, New York State automobile inspections, and a variety of automatic and hand car wash and detailing options, TS Car Care is conveniently located next to Turning Stone at Patrick Road in Verona.

Oneida Innovations Group

The Oneida Innovations Group provides cutting-edge innovation and technology operations by employing top talent among our technology professionals. Oneida Innovations Group provides technology services to all of the Oneida Indian Nation’s operations and enterprises, and also delivers sophisticated technology services to the U.S. Department of Defense and other third-party customers.

Professional Services: Professional Services includes departments that provide administrative or operating support to both the Government and Business Operations.

Guiding Principles

Equal Employment Opportunity

The Oneida Indian Nation is committed to the principle of equal employment to all qualified individuals regardless of race, color, religion, national origin, sexual orientation, gender, age, marital status, pregnancy, and physical and/or mental handicaps not related to job requirements. This policy of non-discrimination applies to all conditions of employment including recruitment, selection, training, discipline, compensation, promotion, transfer, lay-off, recall and termination.

American Indian Opportunity

One of the key objectives prompting strategic planning for the Nation's operations is to provide employment opportunities for qualified American Indians, giving preference to members of the Oneida Indian Nation.

American Indian status is a factor to be considered, along with qualifications and job performance, when considering both American Indians and others who are applying for the same employment opportunities. Where qualifications and job performance of candidates are equal, American Indian status will be strongly considered in the hiring decision.

Internal Recruitment

The Nation is committed to providing qualified candidates with opportunities for career growth and advancement. To that end, all jobs are posted in designated areas within Nation work locations for a period of at least five consecutive days.

In some cases, the Oneida Indian Nation may recruit internally and externally simultaneously.

To be considered for an open position, all internal applicants must complete an internal job posting form and present it to their current Manager/Department Head to begin the internal approval process. In most instances, in order to post outside of the existing department, employees must have worked in their current department for at least 6 months. If internal candidates are posting for positions within their current department, no waiting period will apply.

Human Resources will screen all internal applications to ensure that applicants meet the documented minimum requirements of the position, as well as to ensure that all necessary internal approvals have been obtained. Only those candidates whose work records and qualifications meet minimum standards will be forwarded to the hiring department. Employees may not make application directly to a department without completing an internal job posting form and following the internal posting process.

Employment at Will

This Guidebook has been written to summarize the Nation's policies and procedures and is in effect immediately. This guidebook is presented as a matter of information only, and does not constitute a contract of employment between the Nation and its employees. The Nation is an "employer-at-will". This means that employment is not guaranteed for any period of time and can be terminated by either the employee or the Nation at any time. Only the Nation Representative(s), Chief Executive Officer, Chief Operating Officer and Vice President for Human Resources are authorized to modify the Nation's at-will employment policy or enter into any agreement contrary to this policy. Such agreement must be in writing and be signed by the Nation Representative(s), Chief Executive Officer, Chief Operating Officer or Vice President for Human Resources.

The Nation, acting in its best interests, retains the right to modify, suspend, change, terminate, or supersede, in whole or part, any of the policies contained in this Guidebook.

The Human Resources Department will be responsible for communicating any changes to this Guidebook. If you would like more information on a particular topic, a review of the policy can be made through your supervisor or the Human Resources Department.

Workplace Violence

The Nation does not tolerate any form of threat or violent behavior toward or between employees and views the subject of workplace violence as a very serious issue.

If an employee observes or experiences threatening or violent behavior by anyone on Nation land, whether they are an employee or not, they should report it immediately to their supervisor; or, when a supervisor is not immediately available, the Oneida Indian Nation Police, Turning Stone Resort Casino Security, YBR Casino & Sports Book Security, Point Place Casino Security, or The Lake House Security depending on location.

Violent behavior includes oral or written statements, gestures or expressions that communicate a direct or indirect threat of harm. Violence, threats of violence, bullying, harassment, intimidation, stalking and other disruptive behavior will not be tolerated.

Anyone who commits such acts may be removed from the premises and will be subject to disciplinary actions, criminal penalties or both, up to and including termination.

Supervisors who receive reports of inappropriate or disruptive behavior must report them immediately to Human Resources, Oneida Indian Nation Police, Turning Stone Resort Casino Security, YBR Casino & Sports Book Security, Point Place Casino Security, or The Lake House Security depending on work location.

All threats or violent acts will be documented by the Human Resources Department, Oneida Indian Nation Police and/or the Security Department.

Harassment/Sexual Harassment

Oneida Nation Enterprises (“ONE”) is committed to maintaining a workplace free from harassment. This policy applies to all employees, applicants for employment, interns, whether paid or unpaid, contractors and persons conducting business, regardless of immigration status, with ONE. All employees and other persons conducting business with ONE are required to work and to conduct themselves at all times in a manner that prevents harassment in the workplace.

Employer’s Policy for the Prevention of Harassment

No employee shall engage in any conduct that causes or permits any guest or employee to be harassed. For purposes of this policy, harassment consists of unwelcome conduct, whether verbal, physical or visual, based upon a person’s gender, gender identity, color, race, religion, national origin, age, disability, veteran status, citizenship, sexual orientation, or other protected status. Any harassing conduct that interferes with an individual’s work performance or tends to create an intimidating, hostile or offensive working environment is prohibited and considered a form of employee misconduct. Disciplinary action, up to and including termination of employment, will be taken against any employee or individual subject to this policy who engages in harassment, and against managers, supervisors, or other members of leadership who knowingly allow harassment to occur or continue.

Retaliation, including threatened retaliation, is strictly prohibited against any employee who reports suspected harassment in good faith or who cooperates or is involved in an investigation of a harassment complaint. Any employee or person covered by this policy who retaliates against anyone involved in a harassment investigation will be subjected to disciplinary action, up to and including termination.

Prohibited Harassment

Sexual harassment is a form of workplace discrimination and is against the law. All employees have a legal right to a workplace free from sexual harassment. To protect this right, employees are urged to report any instances of harassment, including sexual harassment, or suspected harassment by filing an internal complaint with Human Resources immediately. Complaints can be made to Human Resources verbally or in writing. Complaint forms are available in Human Resources or via the employee intranet.

Unlawful harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace, on personal devices or during non-work hours.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual’s sex when:

1. Submission to the conduct is an explicit or implicit term or condition of employment;
2. Submission to or rejection of the conduct is used as a basis for employment decisions; or
3. The conduct has a purpose or effect of interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment.

A sexually harassing hostile work environment may consist of words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance also constitutes sexual harassment. Sexual harassment also includes any instance in which a person in a position of relative authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment.

Examples of Sexual Harassment

The following examples describe some types of conduct that may be sexual harassment, and which are prohibited by this policy.

1. Explicit sexual propositions, verbal sexual innuendoes, suggestive comments, inappropriate or sexually oriented "jokes" or comments about gender specific traits;
2. Nonverbal suggestive or insulting noises, leering, whistling or obscene gestures;
3. Unwanted physical contact, such as:
 - Touching, pinching, patting, grabbing, brushing against another person's body or poking another person's body;
 - Unwanted physical contact, including kissing, hugging, or other contact of a sexual nature, or attempts to coerce unwanted physical contact; or
 - Rape, sexual battery, molestation or attempts to commit these assaults.
4. Offensive printed or visual material, including pornography or other materials which reference other protected status.
5. Hostile actions taken against an individual because of that individual's sex, sexual orientation, or other protected status such as:
 - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
 - Sabotaging an individual's work; or
 - Bullying, yelling, name-calling.
6. Unwanted sexual advances or propositions, such as requests for sexual favors accompanied by implied or express threats concerning the victim's job performance evaluation, a promotion or other job benefits or detriments.
7. Sexually oriented gestures, noises, remarks, jokes or comments about a person's sexuality or sexual experience, which create a hostile work environment.

These lists of examples of harassment are not exhaustive, and the fact that a specific act or behavior is not listed in the examples above does not necessarily mean that it does not constitute harassment.

Prohibited Retaliation

Retaliation can be any actual or threatened adverse action that would keep a victim of harassment, including sexual harassment, from coming forward to make, support, or cooperate in the investigation of a harassment claim. Adverse action may not be taken against any person who has:

- filed a complaint of harassment;
- provided information, testified, or cooperated in an investigation or proceeding involving harassment;
- opposed harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment;
- complained that another employee has been harassed; or
- encouraged a fellow employee to report harassment.

Examples of adverse action that may constitute prohibited retaliation if taken in response to the actions listed above can include: demotion, salary reduction, job termination, denial of a raise, denial of promotion, missed training opportunities, job reassignment, switching an employee to a less desirable schedule, a poor performance review; micromanagement, or exclusion from team member activities.

Reporting Harassment

ONE cannot prevent or remedy harassment, including sexual harassment, unless it knows about it. Any person who has been subjected to behavior that may constitute harassment, or who has witnessed or becomes aware of such behavior, is encouraged to report such behavior to a supervisor, manager or to Human Resources.

Reports of harassment, including sexual harassment, may be made verbally or in writing. A suggested form for submission of a written complaint is attached to this policy, and all employees are encouraged to use this complaint form. Employees who are reporting harassment on behalf of other employees should use the complaint form and note that it is on another employee's behalf.

If an employee witnesses or is being subjected to harassment, the employee is encouraged to report it promptly to any of the following:

- their Supervisor, Manager or Department Head;
- a Human Resources Representative; or
- any member of management with whom they are comfortable.

Managers and supervisors are **required** to report any complaint of suspected harassment, including sexual harassment, that they receive, or any harassment that they observe or become aware of, to an Employee Relations Representative in Human Resources. In addition to being subject to discipline if they engaged in harassing conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected harassment or otherwise knowingly allowing harassment to continue. Supervisors and managers will also be subject to discipline for engaging in any retaliation.

Investigation of Harassment Complaints

All complaints or information about suspected harassment, including sexual harassment, will be investigated, whether that information was reported in verbal or written form. The investigation of any complaint, information or knowledge of suspected harassment will be prompt and thorough, commenced and completed as soon as possible. All such reports will be treated with confidence to the extent possible, within the constraints of applicable law and the need to conduct a thorough investigation.

In conducting investigations into any complaint of harassment, Human Resources will take, at a minimum, the following steps:

- Upon receipt of complaint, Human Resources will conduct a review of the allegations, and take any interim actions, as appropriate.
- If documents, video, emails or phone records are relevant to the allegations, Human Resources will take steps to obtain and preserve such documents.
- Interview the parties involved and any relevant witnesses.
- Create a written documentation of the investigation (such as a letter, memo or email), and the final resolution of the complaint, together with any corrective actions action(s) taken.

At the conclusion of the investigation, Human Resources will promptly notify the complainant of the final determination, and will implement any corrective actions identified in the written document.

Our Standards

In accepting your position as an employee with the Nation, you have joined a remarkable community of individuals. Each of us contributes to the overall success of the Nation and as such we have high expectations of one another. These expectations are founded in the Oneida Way and are further clarified in this section. Each employee will declare their agreement to uphold the standards by signing the Employee Guidebook Receipt.

As representatives of the Oneida Indian Nation, employees are expected at all times to set the proper example and conduct themselves in accordance with the highest ethical and personal standards both on and off duty.

Confidentiality

The Oneida Indian Nation and its various business enterprises acquire, develop and use confidential information on a daily basis. Such information includes (but is not limited to) proprietary contracts and business and financial records of the Nation and its enterprises, strategic plans, business plans, marketing strategies, personal information concerning Oneida Members, and/or client/guest account information, and other non-public proprietary information of the Nation and its various business enterprises—all regardless of format (oral, written, electronic, etc.).

All confidential information regarding the Nation and its various business enterprises should be treated as confidential and handled with care. Employees will not reveal, discuss or disclose confidential information to any person or entity except as necessary to carry out the business of the Nation, and then only according to procedures established within the employee's department. This requirement will continue for all employees even after termination of their employment with the Oneida Indian Nation.

Any employee who is found to have breached the confidentiality of any confidential information shall be subject to corrective action, which may include corrective counseling or termination.

Drug/Alcohol Free Workplace

While the Nation respects the private lives of all employees, it recognizes that any involvement with alcohol or illegal drug use can have a negative impact on the workplace, on clients and guests, and on fellow employees. Employees are required to report for work with no illegal drugs or alcohol in their bodies, and may not be under the influence of marijuana or any other legally-obtainable drug that would impair their abilities while at work. Employees shall not consume alcohol, marijuana or engage in illegal drug use while on duty.

The Nation has implemented pre-employment testing procedures designed to discourage employing individuals who use illegal drugs. Further, after hire, the Nation reserves the right at any time to administer testing procedures to any employee at random, or in order to detect the presence of illegal drugs, alcohol or marijuana in his or her body if impairment is observed. The Nation also reserves the right to administer alcohol and drug testing following an on-the-job injury or accident involving Nation or client/guest property. Employees who come to work for the Nation understand, as part of their employment, that they may have periodic drug tests; this is a requirement of employment here.

Gifts and Favors

Employees may not accept gifts (including expense-paid trips, or attendance at an event which normally requires paid admission) or indirect or direct favors, trades, loans or preferential treatment of any sort from any person or organization doing or seeking to do business with the Nation.

As an exception, employees may accept gifts of nominal value such as advertising novelties (pens, pencils, calendars, etc.). An employee must immediately disclose to his or her Department Head any gift accepted from any person or firm doing or seeking to do business with the Nation. The Department Head will in turn notify Human Resources.

Solicitation

The Oneida Indian Nation is committed to supporting the local community and its needs. The Nation performs community support through the Oneida Indian Nation Foundation. The Nation encourages employees to participate in charitable Foundation activities during non-work hours.

For the protection of our employees and to avoid any disruption in the work day, the Oneida Indian Nation prohibits all other solicitation of any kind by one employee of another employee while either the person doing the soliciting or the person being solicited is on working time. Working time includes the time during which any of the employees involved are supposed to be performing work functions, and does not include scheduled rest periods, meal breaks, and other specified times when employees are not expected to be working.

Similarly, the distribution of written materials (such as advertisements, handbills, printed or written literature of any kind) or any other matter by employees is prohibited during working time and in working areas.

Commercial transactions (including but not limited to the purchase or sale of school or commercial fundraising items, products, and services) and fundraising or distribution of materials for social purposes (including but not limited to parties and events) are not permitted at any time without the prior authorization of the Nation.

Solicitation and distribution by employees are always prohibited in public areas. Solicitation, distribution, and trespassing by non-employees on the Nation's premises is prohibited at all times.

The WeAreONE Image Standard

We all have the honor of representing the Oneida Indian Nation and its people. Therefore, how we present ourselves reflects upon the Nation. Through Oneida Nation Enterprises, the Nation and its employees have built an award-winning, word-class reputation recognized by industry leaders like Forbes, Conde Nast, Casino Player Magazine, Golf Digest, and many others. Our guests have come to expect the elements that set ONE apart – the cleanest venues, the friendliest employees and the most exceptional experiences. A big part of that experience is you, with your quick smile, your eagerness to help, and your willingness to maintain the professional image that our guests have come to associate with us.

These guidelines reflect our standards of excellence and respect for our guests while supporting the Nation’s reputation as a world-class organization. The details outlined in these Image Standards are consistent with standards for the top hospitality and entertainment brands in the world. These guidelines may, or may not, be consistent with the way you choose to dress during non-work hours. A good rule of thumb: when you’re getting dressed for work and you have any question in your mind whether what you’re wearing is appropriate, that’s a good indicator to change into something different. (“Maybe” most likely means “No.”)

Regardless of your role – whether you work regularly with our guests or with your colleagues -- taking pride in your appearance makes you a role model for those around you. Your appearance conveys the attitude of excellence that has become synonymous with ONE. The image of our team is professional, approachable, clean and polished. It inspires the confidence of our guests and pride in our workplace.

Remember, you are the key to maintaining our reputation for excellence and for creating an unparalleled experience for our guests each and every day. The following guidelines establish consistency and support the quality and integrity of the ONE experience.

Standards and Good Judgment for All of Us:

The WeAreONE Image Standard starts with our appearance and behavior, which are upheld by all employees to ensure the best experience for our guests. Our employees must display our standards of personal hygiene, attire and appearance at all times. The behavior of each employee is courteous and conscientious, and our employees are expected to exhibit good judgment at all times to benefit the Oneida Indian Nation, fellow employees and guests. Anything that distracts from the guest experience or our professional environment is not in the best interest of the Nation and will not be permitted.

No matter what your role is, anywhere you work you are “on stage.” Your attitude and performance affect everyone’s experience, whether you work with guests or with your colleagues. Often, it’s the seemingly little things that detract from our guests’ enjoyment – chewing gum, eating and drinking, having poor posture, using a cell phone or frowning. Of course, smoking and eating in guest view are prohibited. All of this adds up to one of the most important aspects of your role in enriching our guests’ experiences.

Grooming & Hygiene

Due to close contact with guests and fellow employees, regular bathing; frequent hand washing; clean, neat hair; and use of an antiperspirant/deodorant is required. For the same reasons, the use of strong, heavy scents and fragrances is not permitted. If makeup is worn, it should be applied in moderation and blended to create a professional look.

Body Modification & Tattoos

Intentional body modification or alteration for the purpose of achieving a visible, physical effect that disfigures, deforms or similarly detracts from a professional image is prohibited. Examples include, but are not limited to: visible tattoos, branding, body piercing (other than traditional ear piercing for females), tongue piercing or splitting, tooth filing, earlobe expansion and disfiguring skin implants. Jewelry, spacers, retainers or plugs are not permitted in any body piercing while working. Tattoos must be discreetly and completely covered at all times.

Undergarments

Employees are required to wear appropriate undergarments at all times. Patterned or colored undergarments that are visible when worn under light-colored clothing are not permitted. Solid black or white crewneck or V-neck undershirts may be worn under uniforms with a traditional neckline, depending upon the color of your uniform. Your leader will define the color for your position. With the exception of an undershirt, undergarments should not be visible at any time.

Distracting Behavior

Chewing gum, eating, or drinking at any time while in view of guests we serve distract our focus on the guest, and therefore is not allowed. Personal cell phones and other digital devices may be used during break times only, in designated non-public break areas only.

Hair Styles

Male

Hairstyles that are clean, natural and well-maintained represent the WeAreONE Image Standard. Hair must be neatly cut and styled so that it does not extend beyond or cover any part of the ears or the shirt collar. The overall style must be neat, natural and balanced proportionally.

- Well-maintained braided hairstyles are permitted.
- Styles that are long on top may be worn if secured in a tight, neat bun
- Artificial hair is permitted if it looks natural and meets all the above requirements.
- Sideburns should be neatly trimmed, straight, and even in width. They should blend naturally from the hairline and may end at the bottom of the earlobe
- Flares, muttonchops or pencil-thin sideburns are not permitted.
- If the hair color is changed, it should be well maintained. Examples of hair color that is not considered natural looking would be colors such as blue, green, pink, orange, purple, etc. Highlights are approved provided they blend with the overall hair color and style.

- A fully grown-in, well maintained mustache is permitted. Beards or goatees are permitted, except for staff serving or preparing food in restaurants, kitchens or food service areas. Facial hair must be neatly trimmed and create an overall look that is neat and polished. Facial hair may not exceed 1 inch in length. Neck must be clean shaven. Beards must have a defined cheek line and neckline which is trimmed neatly. Mustaches are not to extend beyond the upper lip. A non-shaven stubble beard is not acceptable. Aside from approved styles, employees must be clean-shaven every day.

Headwear for sun protection or safety will be issued in accordance with approved guidelines created for your specific job functions.

Female

Hairstyles that are clean, natural, and well maintained represent the WeAreONE Image Standard. Hair below shoulder length should be confined if it falls forward over the face or covers the nametag while working. The overall style must be neat, natural, and balanced proportionally.

- Well maintained braided hairstyles are permitted.
- Artificial hair is permitted if it looks natural and meets all of the above requirements.
- If the hair color is changed, it should be well maintained. Examples of hair color that is not considered natural looking would be colors such as blue, green, pink, orange, purple, etc. Highlights are approved provided they blend with the overall hair color and style.
- Employees working in restaurants or food service areas must tie back hair if the length touches the shoulder.

Headwear for sun protection or safety will be issued in accordance with approved guidelines created for your specific job functions.

Fingernails

Male

Clean, presentable fingernails are a must, and should not extend beyond the tip of the finger.

Female

Fingernails should be clean, and should not exceed one-quarter of an inch beyond the fingertip. If polish is used, it should be an appropriate, uniform color. Nail colors that are not permitted include black, gold, silver, multicolored or neon. Charms or decals on fingernails are not permitted.

Attire - All Employees

Condition of Clothing

All garments should be pressed, well-fitted and present a neat, clean appearance appropriate for the workplace. Clothing should be free from rips, frays, stains, wrinkles or holes. Attire should appear thought out, not thrown together. Clothing with written messages or logos other than those affiliated with the Nation or its enterprises are not permitted.

Name Tags/ID Badges

We are a first name organization. Name tags must be worn in a readable position on the upper left shoulder or lapel. Employees must be prepared to present their Nation-issued photo identification badge upon request. Name tags and badges should not be worn in guest areas during off-duty hours or when not in compliance with appearance standards.

Eyewear

Employees may not wear dark glasses in indoor work areas. Sunglasses are allowed for employees who work outdoors. However, keep in mind that sunglasses are a block to interpersonal communication with guests and should be removed when engaging in extended interactions with guests. Sunglasses should not be visible when not in use. The frames and lenses of both prescription eyeglasses and sunglasses should be a conservative color and style with only minimal contrasting logos. If colored or tinted contact lenses are worn, the resulting eye color must be natural looking. Decorated lenses are not permitted, nor are any looks that would be considered distracting or not in the best interest of our culture.

Pins/Buttons

Only Nation-approved, business-related buttons or pins may be worn on the lapel or below shoulder area in publicly accessible areas unless authorized by the Nation.

Employees in Uniform

Uniforms should be clean and neat at all times. Employees must be in full uniform, ensuring sleeves are not rolled up and shirts are buttoned and tucked in whenever you are in guest view. A belt in good condition should be worn with pants if the standard calls for the shirt to be tucked-in. Personal garments may not be added to or substituted for the uniform unless specifically approved. The Wardrobe Department will provide the standards for any personal garment authorized. Uniforms must be worn as they are designed. For example, they should not be worn too loose, too tight, low on the hips, or in other ways that are sloppy or ill-fitting. Any questions pertaining to the fit of a uniform should be addressed with your supervisor or the Wardrobe Department to make sure the appearance meets the requirements of the WeAreONE Image Standard.

As a reminder, you are responsible for the proper care and handling of all uniform pieces issued to you. Uniforms issued to you remain the property of the Nation and must be returned in good condition upon request or at the time of separation or transfer. When wearing a uniform off property, remove your nametag and do not wear your uniform for personal use.

Footwear with Uniforms

The required footwear may differ depending on your job duties and business location. Before buying work shoes, socks and hosiery, employees should check with their leaders or the Wardrobe Department to ensure proper style and color to properly represent the WeAreONE Image Standard.

Slip-resistant rubber-soled shoes may be required for some positions and are recommended in all areas as a safety precaution. Approved shoes, sock and hosiery are required the first day you are in uniform.

Employees are responsible for ensuring shoes are kept clean and in good condition at all times.

Dress shoes must be leather, suede or other material that can be polished, with no contrasting logos. Athletic shoes must be solid in color with no contrasting logos.

Accessories with Uniforms

Jewelry is permitted provided it does not distract from the overall appearance. Please use the following guidelines:

- A modest bracelet in good taste and condition may be worn with the uniform. Bracelets may only be worn on the wrist, should not exceed one inch in width and must fit closely to prevent slippage. Charm bracelets are approved provided the charm or dangle does not interfere with daily work assignments.
- Ankle bracelets are not permitted unless they are being worn as a medical alert bracelet.
- Watches should have minimal ornamentation.
- A modest visible necklace in good condition may be worn with the uniform top. The necklace should be clean, complement the uniform and not interfere with work assignments. If a pendant is attached it should not exceed one inch in size.
- A ring may be worn on any finger, however only one ring on each hand is permitted.
- Male employees are not allowed to wear earrings.
- Female employees may wear up to two earrings in each ear. Earrings must be a simple, matched pair in gold, silver or a color that matches the uniform. Earrings may be clip-on or pierced, hoop or dangle and must be worn on the bottom of the earlobe. Earrings may not exceed the size of a quarter.
- Jewelry guidelines may vary by venue due to safety or regulatory guidelines. Please see a leader for additional details.

Non-Uniformed Employees

To maintain the WeAreONE Image Standard of excellence, clothing should be clean, neatly pressed and fit properly. Clothing should not appear too tight, too baggy, faded or in need of repair. Remember, anything that could be considered distracting is not in the best interest of our operations.

Attire for Non-Uniformed Females

- Professional options for females include: dress pants with a blouse or sweater, a skirted or pants suit, or a dress with or without a jacket.
- A blazer or suit may be required at certain times, depending on your work location and the nature of your role. Check with your leader for more information.
- Shirts, blouses, and dresses may have long sleeves, short sleeves, mid-sleeve or cap-sleeve. Tank tops, spaghetti straps and other casual styles are not acceptable.
- Business-style, mid-calf capri pants are permitted.
- Cotton twill pants, khakis and business-style mid-calf capris are permitted only if they are neatly pressed.
- In addition to the above, females working in Golf/Recreation are permitted to wear dresses, golf-style shorts, or wrap-around shorts/skorts with at least a 7 inch inseam. Shorts may be paired with a neat, well-maintained polo or golf-style shirt.
- The following clothing options are not permitted: polo or golf-style shirts (except for Golf/Recreation mentioned above), cargo-style pants, t-shirts, sundresses, knit/spandex leggings, shorts, wrap around shorts/skorts, one-piece rompers and garments made of denim fabrics.
- Clothing Lengths: Dress and skirt lengths may range from three inches above the top of the kneecap bone to the bottom of the ankle. The length of shorts should be from the top of the kneecap bone to four inches above the top of the kneecap bone. Slits in skirts, kick pleats, and buttoned or snapped closures should not exceed five inches above the middle of the knee. Pants should be long enough to touch the top of the ankle and may not drag on the floor.
- Fabrics and Patterns: Fabrics should be those traditionally acceptable for business, such as tweed, wool, cotton, polyester, silk, linen rayon or blends of these fibers. Unacceptable fabrics include: spandex, sheer, metallic, clinging knits and denim. Clothing with non-company logos are not approved. Sportswear is not permitted except in Golf/Recreation areas noted.
- Footwear: Dress shoes or boots in good business taste are required. Dress shoes are permitted to have an open toe and/or sling back. Athletic shoes, casual sandals and Western boots are not permitted.
- Hosiery is optional for non-uniformed females. If hosiery is worn, it should be sheer or opaque hosiery in subdued shades.
- Hair Accessories: Hair accessories should be conservative and coordinate with the outfit.
- Jewelry:
 - Rings, necklaces, bracelets, earrings, lapel pins and a business-style wristwatch are permitted. A pin, broach or scarf clip in good business taste if also acceptable.
 - Watches should have minimal ornamentation.
 - Two necklaces and two bracelets in good business taste that coordinate with the outfit and each other are permitted.
 - Ankle bracelets and toe rings are not permitted.

Attire for Non-Uniformed Males:

- Professional options for males include: dress pants and a short or long sleeved professional dress shirt with are required. A necktie or bow tie is required, but clip-on ties are not allowed.
- A sport coat or suit is required for management staff or males whose assigned work location is in a public area.
- Cotton twill pants (khakis) are permitted only if they are neatly pressed.
- The following clothing options are not permitted: polo or golf-style (except for Golf/Recreations employees), cargo-style pants, t-shirts and garments made of denim fabric.
- In addition to the options above, non-uniformed men working in Golf/Recreation are permitted to wear dress or golf-style shorts with at least a 9 inch inseam. Shorts may be paired with a neat, well-maintained polo or golf-style shirt.
- Fabrics and Patterns: Fabrics should be those traditionally acceptable for business, such as tweed, wool, cotton, polyester, silk, linen rayon or blends of these fibers. Unacceptable fabrics include spandex, metallic, sheer, clinging knits and denim. Clothing with non-company logos are not approved. Sportswear is not permitted except for those Golf/Recreation positions noted.
- Footwear: Dress shoes and sock in good business taste are required. Sandals, athletic shoes, Western boots and deck shoes are not permitted.
- Jewelry:
 - Lapel pins, tie bars or clips, collar bars, cufflinks, rings, a bracelet, a necklace and a business-style watch are permitted.
 - Watches should have minimal ornamentation.
 - A ring may be worn on any finger, however only one ring on each hand is permitted.
 - Earrings are not permitted.

Variations on the WeAreONE Image Standard

Additional guidelines, standards or exceptions may be authorized in specific venues or work areas at the direction of Department Leadership and Human Resources in consideration of creating a safe environment for our guests and coworkers or for purposes of creating a different guest experience.

Holding Each Other Accountable for the WeAreONE Standard

Your success as an employee rests, in part, with your commitment to representing the Oneida Indian Nation with a polished, professional image and creating a positive first impression with our guests. Your leaders are held accountable for enforcing these standards consistently with each employee.

If you are unsure of whether particular styles or trends would be appropriate for our workplace, or to review any exceptions, please consult with Human Resources in advance of adopting the style.

Requests for exceptions to these guidelines due to operational, medical, religious or cultural reasons will be considered. Please consult with Human Resources.

Nation Property

Except as otherwise set forth in this Guidebook, Nation property, equipment or vehicles are to be used by employees only in the performance of their job duties. Employees must have a valid driver's license if operating a Nation vehicle. Nation equipment/supplies or vehicles are to be used only for Nation business, Nation-sponsored activities or employee development purposes.

Employees are prohibited from willfully or carelessly damaging or destroying Nation property, facilities, vehicles and/or equipment.

Smoking

Smoking and use of other tobacco products to include chewing tobacco, vaping products and other electronic cigarettes are prohibited except in designated smoking areas during authorized break periods. The Oneida Indian Nation smoking ordinance is available from Human Resources upon request.

Disposal of tobacco products must be in appropriate containers and cigarettes must be extinguished.

Worksite Appearance Standard

Employees are responsible for the condition of their worksites as well as all of the common areas (conference rooms, lounges, restrooms, corridors, stairwells, etc.) This responsibility includes:

- Neatness, cleanliness and business-like conditions
- Care of all furnishings and equipment
- Securing of all confidential information, as defined in this Guidebook
- Elimination of hazards

Employee personal items in the work area should not interfere with productivity or contribute to an unsafe or unprofessional work environment. Any personal items in the work area are subject to manager approval.

Organizational Communication

Employees of the Nation are located at various work sites and locations. We will make every effort to share important information relating to the Nation and/or its Government with our employees through various methods of communication including:

- Employee meetings/updates, including pre-shift meetings and Team Talks
- Bulletin boards in individual work areas. Bulletin boards are designated for use by management only. Employees are not permitted to post information on bulletin boards
- Digital communication screens located in back-of-house employee areas
- Oneida Indian Nation publications
- Oneida Indian Nation Facebook page and The Employee App

- The employee intranet accessible on Nation computers and kiosks, or from home or on a mobile device
- Web pages for the Oneida Indian Nation and its enterprises
- Departmental logs
- Mailings to employees' homes

Employees are encouraged to monitor all of these areas to ensure receipt of important information and communications.

Cell Phone/Personal Electronic Device Usage/Computer Use

In the interest of respect to our clients and guests, employees should refrain from cell phone/electronic device use in publicly accessible areas unless there is a legitimate operational purpose. Employees may only use personal electronic devices and receive personal calls and/or texts during non-work time and in approved break areas.

The use of cellular or electronic devices for the purpose of taking photographs, videos or recordings on Nation properties or in publicly accessible areas is prohibited during working time except for legitimate and assigned operational purposes.

The Nation encourages its employees to remember safety when using their cell phones for business purposes. Using a hand held cell phone while operating a vehicle is prohibited. If an employee needs to make a phone call or text while driving, the individual should find a proper parking space first.

Computers, smartphones, tablets and other electronic communications devices and equipment (also referred to as "Systems") provided by the Nation are property of the Nation. Computer users should be aware that the data they create on the Nation's Systems remains the property of the Nation. If you misplace any device or System, please report it to the ONE IT Helpdesk at 361-7786 immediately.

With the exception of the Nation's e-mail system, Systems issued devices made available by the Nation are for work related purposes only, and may not be used for other purposes, including but not limited to social media purposes, unless otherwise authorized by the appropriate Department Head. With respect to e-mail, employees who have been granted access to the Nation's e-mail system in the course of their work may use the Nation's e-mail system for non-business purposes, during non-work time only, provided that any non-business use during non-work time complies with the Nation's other existing policies, including the anti-harassment policy, confidentiality policy and solicitation policy outlined herein. Non-work time is all time that employees are not expected to be working.

The Nation may, without notice to its users, access and monitor its Systems and obtain the data and communications within the Systems. The Nation's monitoring of its Systems may include, but may not be limited to: accessing, recording, disclosing, inspecting, reviewing, retrieving, and printing communications, logins and other uses of the Systems, as well as keystroke capturing and/or other network sniffing technologies. The reasons for which the Nation may obtain such access include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; ensuring that the Nation's operations continue appropriately during an employee's absence; and any other purpose deemed appropriate by the Nation.

The Nation may store data or communications for a period of time after the data communication is created. From time to time, copies of such data or communications may be deleted. To ensure the integrity, confidentiality, and security of Nation data and communications, employees are prohibited from storing confidential information, as defined in this Guidebook, on personal computers or personal storage devices (e.g., flash drives, personal smartphones and tablets, portable hard drives, etc.).

Employees should not share passwords or access codes with coworkers or unauthorized personnel. Likewise, because the Nation may be monitoring these Systems, employees have no expectation of privacy as it relates to any data or communications created with, transmitted by, or stored on the Nation's Systems.

The Nation's policy prohibiting harassment applies in its entirety to the use of the Systems. Employees are strictly prohibited from using any technology to view, listen to, or communicate content containing materials that would violate the Harassment and Equal Employment Opportunity policies contained in this Guidebook.

Unless expressly authorized, other prohibited electronic activity includes: conducting illegal activity, including online gambling; downloading or distributing pirated software or data, entertainment software, music or games; propagating viruses, worms, and related spyware; and copying, destroying, deleting, distorting, removing, concealing, modifying or encrypting messages or files or other data on the Nation's Systems without the permission of an authorized manager. This list is for illustrative purposes only and is not intended to be an exclusive list of prohibited activity.

No one may access, or attempt to obtain access to, another employee's electronic communications or Systems without appropriate authorization. In addition, employees must log-off of the Nation's Systems or lock their computers when they leave their work station.

Use of Nation Businesses

The Nation offers employee discounts for many of its enterprises and amenities and encourages employees' patronage. A complete list of employee discounts and information on restrictions and limitations are available in Human Resources; however, the following guidelines apply:

- All standards of behavior and work rules apply when visiting any Nation Business.
- Amenities are offered first and foremost for the entertainment of our guests.
- Employees who handle sales transactions are prohibited from earning or redeeming loyalty points in their assigned outlet or sales location. Employees also may not process their own sales or refund transactions. Employees should consult with their manager about specific policies and procedures within their departments.
- Employees may not use any public amenities (other than SavOn Convenience Stores and Maple Leaf Markets) during work time and/or while in uniform unless accompanied by a Manager or Department Head or unless approved by a Manager or Department Head.

Off Duty Conduct

- Obtain management approval prior to visiting casino properties during off-duty hours (see below Section regarding Employee Gaming).
- Do not wear uniform, badge, or items that would otherwise identify you as an employee while visiting casino properties or engaging in gaming during off-duty hours.
- Do not access employee-only areas during off-duty hours or park in the employee parking lot when visiting casino properties as a guest.
- Avoid any activity that may represent a conflict of interest in serving our guests when back on duty.
- Do not have any confrontations with guests or with on-duty Nation personnel.

All employees of the Oneida Indian Nation should remember that they will be held to the highest standards of conduct when visiting or working at any Nation property or facility.

Employee Gaming

Oneida Indian Nation employees are welcome to wager at the Nation's gaming facilities during off-duty hours, with a few important rules to ensure appropriate internal controls.

Loyalty Programs & Promotions

All employees 18 years and older are required to use their own TS Rewards loyalty cards when wagering. Employees are not permitted to participate in casino promotions, drawings, tournaments or giveaways. This includes promotional events in Bingo, Poker, Slots, Keno, Table Games, and Sports Book. Employees who achieve casino VIP status are permitted to participate in private events and dinners, but cannot participate in giveaways or drawings that may be a component of these VIP events.

Sports Book Wagering

Nation employees who are 18 years of age and older may wager at any of the Nation's Sports Book locations with the following exclusions:

- Employees, and any supervisors of such employees, who work in the Sports Book Department at Turning Stone Resort & Casino, YBR Casino & Sports Book or Point Place Casino
- Employees in the Information Technology Department who have physical or remote electronic access or responsibility for Sports betting systems
- Oneida Indian Nation Gaming Commission Employees
- In-house attorneys who represent the Nation
- Executive Management

In addition to these exclusions, all eligible employees must follow these additional guidelines for Sports Book Wagering:

- Employees must have and always use their own employee TS Rewards Card, which includes an employee designation, when placing Sports Book wagers; anonymous play is not allowed. Failure to use your employee TS Rewards Card may result in your ineligibility to collect winnings. Lost TS Rewards Cards must be reported to the TS Rewards Desk.
- Employees who receive cash payouts at a casino cage or at the Sports Book betting desk, must identify themselves as employees at the time of payment. When paying an employee, a Cage Supervisor or Sports Book Manager or Supervisor on duty is required to oversee the transaction.
- Employee Sports Book wagering activity will be audited periodically for any irregularities.

Slot Machines

All Nation employees 18 years and older may play Slot Machines at Turning Stone Resort & Casino, YBR Casino & Sports Book, and Point Place Casino with the following exclusions:

- Employees who work in the Turning Stone Resort & Casino, YBR Casino & Sports Book, and Point Place Casino Slot Departments
- The Director, Manager, Player Services Shift Managers, Host Managers, Executive Hosts and Casino Hosts in the Player Development Department
- Oneida Indian Nation Gaming Commission Employees
- Employees in the Information Technology Department who have physical or remote electronic access to Slot Machines
- All Executive Management

All Nation employees 18 years and older may play Slot Machines at SavOn or PlayOn, with the following exclusions:

- SavOn, PlayOn or Maple Leaf Market employees who hold a gaming license
- Oneida Indian Nation Gaming Commission employees
- Employees in the Information Technology Department who have physical or remote electronic access to Slot Machines
- All Executive Management

All Nation employees 18 years and older may play Slot Machines at The Lake House with the following exclusions:

- Slot Employees assigned to work at The Lake House
- Oneida Indian Nation Gaming Commission employees
- Employees in the Information Technology Department who have physical or remote electronic access to Slot Machines
- All Executive Management

Slot Vouchers

While employees who are allowed to play slot machines will obviously handle slot vouchers when they are at the casinos and other gaming facilities as a guest, employees are prohibited from accepting vouchers as tips, tokens or as payment for goods or services in the course of their work assignments. Should a guest leave a voucher, employees should contact a supervisor immediately. All vouchers received or found at a casino must be turned in to Security at the Casino Base office on the gaming floor. All vouchers received or found at SavOn, PlayOn, or The Lake House must be turned in to the Manager on Duty who will place the vouchers in a secured Lost & Found Box.

In addition to these exclusions, all employees must follow some simple guidelines for playing Slot Machines:

- Employees must have and always use their own employee TS Rewards Card, which includes an employee designation, when playing Slot Machines; anonymous cash play is not allowed. Failure to use your employee TS Rewards Card may result in your ineligibility to collect winnings. Lost TS Rewards Cards must be reported to the TS Rewards Desk.
- Employees who receive cash payouts at a casino cage, from a Slot Services Representative, or a SavOn/PlayOn Gaming Cashier, must identify themselves as employees at the time of payment. When paying an employee, a casino Cage Supervisor or SavOn/PlayOn Manager on duty is required to oversee the transaction.
- Employee gaming activity, comps, Free Play and other records will be audited periodically for any irregularities.

Table Games and Keno

Employees assigned to work at the Turning Stone Resort & Casino (including golf and hotel facilities), YBR Casino & Sports Book, Point Place Casino and The Lake House are prohibited from playing Table Games and Keno at any location. All other employees 18 years and older may enjoy these games.

Poker

All employees 18 years and older may play Poker except Oneida Indian Nation Gaming Commission employees. Employees of the Poker Department may only play Poker at tables designated for Poker employees.

Bingo

All employees 18 years and older may play Bingo except Oneida Indian Nation Gaming Commission employees and Turning Stone Bingo employees.

Pull Tabs

All employees 18 years and older may play Pull Tabs at Turning Stone Resort & Casino, with the following exclusions:

- Oneida Indian Nation Gaming Commission employees
- Turning Stone Bingo employees
- All Executive Management

All employees 18 years and older may play Pull Tabs at SavOn or PlayOn, with the following exclusions:

- Oneida Indian Nation Gaming Commission employees
- SavOn, PlayOn and Maple Leaf Market employees who hold a gaming license
- All Executive Management

Code of Conduct for Employee Gaming and Sports Wagering

Employees may only participate in gaming activity during their non-working hours and, as employees, are held to the highest standards of behavior while on Nation properties. All policies, procedures and standards of behavior apply while employees are on property. Additionally, the following minimum standards apply to employee gaming:

1. License/I.D. badges, uniforms and other articles which would identify players as employees may not be worn at any time while playing or while visiting as a guest.
2. While license/I.D. badges should not be worn while playing, they should be carried by the employee while on property and produced upon request.
3. As always, employees who work at a casino property should advise their manager or supervisor in advance if they intend to be at a casino property during off-duty hours.
4. Eligible employees may play before or after work and on unscheduled days, but are never allowed to play while clocked-in, while on break, or during scheduled work periods. Additionally, employees may not play (or be on any Nation properties) during any unauthorized absence from a scheduled shift or while on leave of absence or administrative or disciplinary suspension.

5. Employee gaming activity may in no way affect or interfere with employees' attendance at work or their job performance.
6. As players, employees should neither expect, nor are they entitled to, any favorable treatment or extra privileges. All employees must avoid any behavior which conveys a conflict of interest with our guests or relating to a business decision.
7. Employees are expected to display the highest standards of respect, courtesy and professionalism to guests, co-workers and Nation property while visiting and playing. Employees should avoid displacing guest business during peak periods. Employees may not get in any line to place a wager if more than 3 guests are already in line or if more than 3 guests arrive in the line behind the employee.
8. Employees must be playing while in gaming areas. They may not loiter in any guest area or at a machine. They may not interfere or distract on-duty employees for non-business reasons.
9. Employees may not be present in the Turning Stone Resort & Casino employee cafeteria, YBR Casino & Sports Book employee dining room, Point Place Casino employee dining room, or any other break rooms or back-of-the-house areas of Nation operations when not scheduled to work, and may not partake of any activities or perks that are intended for on-duty employees.
10. Employee's misuse of the TS Rewards point system for the purposes of personal advantage is prohibited.
11. Management may deny or suspend gaming privileges for any employee at any time for any or no reason and may update this policy at any time with or without notice.

Attendance Guidelines

We are dependent on one another to provide the best service to our guests, clients, partners, and to each other. Therefore, the team and the organization suffers when an employee is absent for all or part of a scheduled shift.

All employees should report for work in sufficient time to be at their work area at their scheduled start time.

Any employee who knows they are going to be absent or late for any scheduled shift must personally call in to their department supervisor prior to his/her shift start time. In most cases, a two hour notice is recommended. Specific call in procedures will be outlined in each department.

Employees should schedule medical and personal appointments on their days off, to the extent possible.

Paid Time-Off (PTO) is provided for the purpose of income replacement for scheduled and unscheduled time away from work. PTO is intended to be used for planned vacations or personal appointments, but may be applied to unplanned absences at the employee's discretion.

Paid Sick Time (Sick Time) provides both income replacement for planned and unplanned absences, as well as job protection for a reasonable number of absences each year. Generally, Sick Time is intended for unplanned absences due to illness or family care, but may be used for other personal reasons at the employee's discretion.

Definitions:

For the purposes of these attendance guidelines, the following definitions apply:

Excused Absence: Absences which are not counted as occurrences within the Attendance Policy and are not subject to corrective counseling action. Absences are excused when:

- Earned Sick Time is applied; or,
- The Employee was not scheduled because the employee had an authorized, scheduled day off, or an approved leave of absence. Employees should request scheduled time off in accordance with their departmental scheduling procedures and/or ONE's Leave policies.

Unexcused Absence: Any absence from a scheduled shift for which Sick Time was not available or requested to be applied. The use of PTO does not excuse the absence.

Occurrence: An Occurrence is the term used to measure unexcused absences or incomplete shifts, and is the basis for consistent application of corrective counseling due to attendance infractions.

Incomplete Shift: Any late arrival (failure to clock in or be present at the work area by the scheduled start time) or early departure (leaving the work site prior to the scheduled end time) from a scheduled shift that was not a result of an authorized change to the schedule due to a change in business needs. Application of Sick Time to a late or early out excuses the absence.

No Call/No Show: When an employee is absent from work and fails to notify his or her department of the absence or reports to work two (2) or more hours later than the scheduled start time without notification, a Level 3 Final Written counseling will be issued. A second No Call/No Show within a year of the issuance of a Final Written will result in separation. Two consecutive No Call/No Shows is considered job abandonment and processed as a voluntary resignation.

Absences or Incomplete Shifts Due to Illness or Injury:

- An employee who anticipates being out of work and/or is absent due to illness or injury for three or more consecutive scheduled shifts, should notify their immediate supervisor of their absence, and contact Human Resources to determine if the absence qualifies for any job-protected leave.
- Medical certification or documentation may be required for absences of 3 or more days and/or for a request for a modified or reduced schedule. While employees should communicate absences to their department supervisor or manager, any medical certification or documentation should be provided only to Human Resources. Medical certification or documentation must be complete and compliant with the ONE approved leave or accommodation request forms.

- Absences or incomplete shifts that are the result of an approved leave of absence or accommodation are considered excused and not subject to corrective counseling.
- Absences or Incomplete shifts that occur prior to the Leave of Absence or Accommodation being approved may be subject to corrective counseling if the employee did not provide the required medical certification documentation in the requested time period and/or did not provide notice when notice was foreseeable.

Corrective Counseling for Attendance

Corrective Counseling is intended to ensure clear communication between leaders and employees regarding attendance expectations and the employee's status within the Attendance Guidelines. Multiple unexcused absences or incomplete shifts could lead to disciplinary action up to and including termination.

1 to 5 consecutive shifts of Unexcused
Absence from a scheduled shift = One (1) Occurrence

Any incomplete shift (late or early-out) = One half (1/2) Occurrence

A Level 1 Corrective Counseling will be issued for any 2 Occurrences in any one year period. (Remember that Occurrences are only assigned for absences which are not covered by available Sick Time.)

A Level 2 Corrective Counseling will be issued for 1 Occurrence within 1 year from the date of issuance of a Level 1 Corrective Counseling for attendance infractions.

A Level 3/Final Written Corrective Counseling will be issued for 1 Occurrence within 1 year from the date of issuance of a Level 2 Corrective Counseling for attendance infractions.

An employee will be separated from employment for 1 occurrence within 1 year from the date of issuance of a Level 3/Final Written Corrective Counseling for attendance infractions.

The first No Call/No Show infraction is subject to an immediate Level 3/Final Written Corrective Counseling. Additionally, if the No Call/No Show is not excused by application of Sick Time, an Occurrence will also be assigned to the absence and progressive counseling may apply to the unscheduled absence. A No Call/No Show for more than one consecutive shift is considered job abandonment and will result in separation from employment.

The above guidelines are intended as a summary of the Nation's attendance guidelines. For additional details and information, please consult with Human Resources or your Department Manager.

Work Rules

The Nation is committed to high standards of personal and professional ethics and integrity from employees both on and off-duty. Employees are particularly responsible for not breaching confidences with respect to Nation financial results or other proprietary or confidential information, in accordance with the Nation's confidentiality policy outlined in this Guidebook.

Reasons for Dismissal: Violation of any work rule, including rules provided in this guidebook or distributed by Human Resources, Department Heads or Executive Management will result in disciplinary action, up to and including discharge. Some of the rules include the following:

1. Rudeness, mistreatment, harassment or lack of proper courtesy to clients, guests and coworkers
2. Dishonesty of any kind or failure to report any indication of dishonesty, whether by another employee, client or guest; or failure to exercise appropriate accountability for Nation funds and/or assets within the employee's control
3. Willful misconduct, deliberate violation or disregard on the part of the employee of standards of behavior, as set forth in this Guidebook, which the Nation has the right to expect
4. Any falsification of an employee's employment application, including false statements of fact or omissions of fact. Falsifying any Nation document or records
5. Removing or having possession of any Nation property or that of any employee, client or guest without proper authorization (all employees carrying packages, shopping bags, backpacks, handbags and other such items are advised that such articles are subject to inspection at any time while the employee is on Nation premises)
6. Interfering or failing to cooperate with any regulatory or law enforcement authority
7. Possession, drinking, selling, exchanging, or being under the influence of intoxicants or non-prescription drugs when reporting for duty or while on duty. Use of illegal substances at any time. This also applies to prescribed drugs except as prescribed for the employee by a physician
8. Repeated or gross violation of Nation safety policies; creating or contributing to unsanitary or unsafe housekeeping conditions; failure to report or correct a safety hazard caused by an employee, or practice of unsafe work habits; failure to use personal protective equipment as prescribed or inappropriate handling of hazardous materials
9. Willfully or negligently misusing, defacing, destroying or damaging any Nation property or property of any employee, client or guest, including alteration of records
10. Gossiping, including about Oneida Members, clients, guests or co-workers, sharing personal or confidential information regarding Oneida Members, clients, guests or co-workers, and other forms of malicious or unprofessional behavior or communication, but excluding communications regarding terms and conditions of employment
11. Any type of substandard work performance, such as carelessness, negligence or non-performance of duties including sleeping while on duty
12. Failure to comply with any reasonable directive from a Supervisor or other proper authority, or any form of insubordination
13. Any manner of communication or suggestion that could be interpreted as solicitation of gratuities in exchange for services offered or performed

14. Obscene or any other unbecoming conduct such as fighting, horseplay or creating a disturbance with clients, guests or co-workers on Nation property
15. Unreported, unexcused, or unauthorized absence, habitual tardiness in arriving at work or returning from breaks. Failure to return from an authorized leave of absence
16. Failure to comply with the grooming and attire standards while on duty
17. Loitering or leaving the place of work during working hours without permission. Being in areas other than those designated to perform usual duties or break areas
18. Violation of the No Solicitation Policy
19. Undertaking additional employment which prevents an employee from meeting his/her employment obligations to the Nation or which creates a real or perceived conflict of interest with the Nation
20. Using the Nation phone systems, voicemails, fax machines, faxes, copiers, planners, vehicles, equipment, offices and office furniture for personal business
21. Carrying firearms, explosives of any kind, or any concealed weapon on Nation property
22. Violation of the Nation's harassment policy
23. Abuse or loss of Nation equipment and/or property, including keys
24. Failure to keep confidential matters concerning the Nation's financial status and/or other confidential information (as defined in this Guidebook) confidential
25. Theft or unlawful possession of stolen, lost or mislaid property
26. Smoking in unauthorized areas
27. Failure to keep one's person and uniform in neat, clean order
28. Absence from work due to incarceration
29. Engaging in any form of illegal gambling on or off duty

Corrective Counseling for Performance and Conduct

Employees are the Nation's most valuable asset. The Nation will make efforts to help an employee correct performance deficiencies before formal corrective counseling takes place. Where progressive discipline is called for, it will be constructive in nature with the purpose of correcting whatever the problem is so as to avoid having to take the next more serious step in the process. The steps the Nation may follow, if appropriate for the circumstances are:

- *Coaching*: To be given when an employee first shows signs of performance deficiencies
- *Written Level I Corrective Counseling*: For minor first time deficiencies which left uncorrected could impact the employee's performance appraisal or result in progressive action
- *Written Level II Corrective Counseling*: Issued when counselings have not had the desired effect, and there has been reoccurrence of the same or similar conduct or performance
- *Final Written Level III Corrective Counseling or disciplinary Suspension*: Issued when there has been a repeated conduct infraction or performance deficiency after at least one written Level 1 Corrective Counseling and one written Level 2 Corrective Counseling have been given for similar infractions or deficiencies

These steps in the corrective counseling process are guidelines. Depending on the severity of the infraction or problem, a written warning level may be escalated, or a disciplinary suspension, or termination may be issued if the circumstances so warrant.

Paid Time Off

The Oneida Indian Nation has long been a leader in offering paid time-off benefits that exceed those that are typically available in our industries. Paid time-off includes all types of requests for time off, including pay for PTO and sick time. A generous paid time-off bank is available with the flexibility for you to decide how you wish to use your time off.

Paid Time-Off (PTO)

Paid Time Off is provided for the purpose of income replacement for scheduled and unscheduled time away from work. PTO is intended to be used for planned vacations or personal appointments, but may be applied to unplanned absences at the employee's discretion.

Paid Sick Time

The Nation is committed to provide Sick Time benefits at levels comparable with other local organizations. Sick Time will be administered in a fair and consistent manner by departments. All employees are eligible for Sick Time as follows:

Full-time salaried and hourly employees

- At the time of hire or change in employment status, employees are granted 7 days (56 hours) of Sick Time.
- Each year thereafter, on an employee's anniversary date, employees are granted 7 days (56 hours) of Sick Time.

Part-time employees

- At time of hire or change in employment status, employees will receive 16 hours of Sick Time. If an employee exceeds the threshold of 480 hours worked per service year, they will have the opportunity to accrue an additional 40 hours of Sick Time at an accrual rate of 1 hour for every 30 hours worked (does not include PTO, Sick, Report Pay or other hours paid but not worked).
- Each year thereafter, on each individual's service anniversary, the employee will be granted 16 hours of Sick Time and continue to accrue a maximum of 40 additional hours of Sick Time per service year once they have reached the 480 hour threshold.

Temporary, Seasonal and On-Call Employees

- At time of hire or change in employment status, employees will begin to accrue sick time at a rate of 1 hour for every 30 hours worked (does not include PTO, Sick, Report Pay or other hours paid but not worked) up to a maximum of 56 hours in a service year.
- Each year thereafter, on each individual's service anniversary, the employee's bank will reset and the employee will have the opportunity to accrue Sick Time up to an annual limit of 56 hours.

Use of PTO and Sick Time

PTO and Sick Time may be applied in a minimum of 4 hour increments.

Employees cannot have negative PTO or Sick Time balances (time must be earned before it can be used).

Hourly employees are paid their base hourly wage or the applicable minimum wage for PTO and Sick Time, whichever is greater. For purposes of this policy, the base hourly wage is the hourly rate paid prior to any Tips, Tokes, Commissions, or other income, and is not used in the calculation of overtime.

Applying PTO and Sick Time

Employees are required to use available paid time (PTO or Sick Time) for any unscheduled absence. For an unscheduled absence, Sick Time will be applied, and if no Sick Time is available a PTO day will be applied. Prior to payroll processing, employees can request PTO in lieu of Sick Time by submitting a request to their supervisor.

Coordination with Holiday Time

PTO and Sick Time entitlements will not be charged if they coincide with ONE designated Holidays for which the employee is eligible for holiday pay.

Coordination with other Paid Leave Time

Employees who are out of work on a covered leave are required to apply their available PTO or Sick Time during the waiting period for Disability or Workers Compensation benefits.

Reserve Account

Salaried employees from all Divisions can carry over up to 56 hours of combined PTO and Sick Time per anniversary year into their Reserve bank up to a maximum of 192 hours. Employees may use the Reserve Account for any approved absence which qualifies the employee for disability or workers compensation benefits, or for qualified Family Medical Leave within Oneida Indian Nation policies. Reserve PTO and Sick Time may not be combined with other pay or benefits to exceed regular pay when the employee is actively at work. Any unused annual paid time-off not eligible for carry-over to the Reserve Account is forfeited each year on the employee's anniversary date. Reserve PTO and Sick Time are not eligible for pay-out or "buy-back" and is not payable at separation.

Buy-Back Provisions

Full-Time Hourly employees in the Professional Services Division will receive a pay-out or "buy-back" of any unused combined PTO and Sick Time up to 24 hours for the year after the employee's anniversary date.

Part-time, Temporary, Seasonal and On-Call employees will receive a pay-out or "buy-back" of unused Sick Time up to 16 hours for the year after the employee's anniversary date.

This benefit gives employees the choice to take time off or receive money in lieu of time off – whichever is most valuable to the employee.

Any unused PTO and Sick Time not eligible for buy-back is forfeited each year on the employee's anniversary date.

Request for Information:

ONE will not request the disclosure of information, verbally or in writing, relating to an absence for which Sick Time is applied. If an employee's absence is 3 or more days under the care of a Doctor, the absence may qualify for a leave under the Nation's Leave Policies. In that instance, documentation to support a Leave and/or other related disability benefit may be requested by Human Resources. The employee and their supervisor should notify Human Resources in a situation where an absence is anticipated to be 3 or more days related to the serious health condition of an employee or the employee's family member.

Transfers/Status Changes:

All earned PTO and Sick Time will be carried between enterprises and departments of the Nation as long as the employee's status is maintained. In situations where transfers and position changes result in a change to the assigned status, the appropriate PTO and Sick Time entitlement will be earned based on the new status group and pro-rated based on effective date in the new position. The employee will never be granted more than 56 hours of Sick Time in a 12 month period.

Employees who *transfer between divisions*, Government, Professional, and Business Divisions will retain their current grant until the next service anniversary. On their service anniversary, their entitlement will be based on the Division and employment status at the time of their anniversary.

Employees who transfer *from* an employment status that Sick Time is accrued (Part-time, On-Call, Seasonal, Temporary) *to* an employment status that Sick Time is Front Loaded (Salaried & Full-time) will get the difference between the front loaded benefit of 56 hours and whatever Sick Time has already been granted to that employee in that service year.

Employees who transfer *from* an employment status that Sick Time is front loaded (Salaried & Full-time) *to* an employment status that Sick Time is accrued (Part-time, On-call, Temporary, Seasonal) will retain their existing Sick Time balance and will not begin accruing into their next service anniversary (employee had already received the maximum 56 hours for that one-year period).

Leave of Absence:

Sick Time entitlements will be unaffected for any combined Qualified Leaves of Absence up to 12 weeks per year. There will be no change to the entitlement date unless there is a break in creditable service.

Termination: If employment terminates for any reason other than misconduct, after settlement of any amounts owed to the Nation by the employee, unused PTO will be paid to the employee up to a maximum of 20 days (160 hours.) PTO paid as a result of employee's separation will be paid to the employee within two (2) pay periods after separation from employment, or after settlement of any amounts owed to the Nation by the employee, whichever is later.

To receive a payout for unused PTO upon separation or change to on-call or temporary status, the employee must have one year of continuous service.

Unused, earned Sick Time will not be paid to the Employee at the time of separation of employment from the Nation.

Any employee who has been terminated for misconduct will not be eligible for any payout of PTO upon separation of employment.

PTO and Sick Day Entitlements:

SALARIED & FULL-TIME HOURLY BENEFIT GROUPS			
Entitlement Service	PTO Days (Hours) Earned	Sick Days (Hours) Earned	TOTAL Paid Days Off
Upon Hire	10 (80 hrs)	7 (56 hrs)	17 (136 hrs)
1yr	15 (120 hrs)	7 (56 hrs)	22 (176 hrs)
2yr	15 (120 hrs)	7 (56 hrs)	22 (176 hrs)
3yr	15 (120 hrs)	7 (56 hrs)	22 (176 hrs)
4yr	15 (120 hrs)	7 (56 hrs)	22 (176 hrs)
5yr	20 (160 hrs)	7 (56 hrs)	27 (216 hrs)
6yr	20 (160 hrs)	7 (56 hrs)	27 (216 hrs)
7yr	20 (160 hrs)	7 (56 hrs)	27 (216 hrs)
8yr	20 (160 hrs)	7 (56 hrs)	27 (216 hrs)
9yr	20 (160 hrs)	7 (56 hrs)	27 (216 hrs)
10yr	20 (160 hrs)	7 (56 hrs)	27 (216 hrs)
11yr	20 (160 hrs)	7 (56 hrs)	27 (216 hrs)
12yr	20 (160 hrs)	7 (56 hrs)	27 (216 hrs)
13yr	20 (160 hrs)	7 (56 hrs)	27 (216 hrs)
14yr	20 (160 hrs)	7 (56 hrs)	27 (216 hrs)
15yr&Above	20 (160 hrs)	7 (56 hrs)	27 (216 hrs)

Holidays and Holiday Pay

The Nation provides holiday pay benefits based on operational needs. The holidays observed for the Professional Services Division are:

New Year's Day	Thanksgiving Day
Memorial Day	Day after Thanksgiving
Juneteenth	Christmas Day
July 4 th	
American Indian Day (for enrolled members of a federally recognized tribe only)	
Labor Day	
Veterans Day	

Eligibility Criteria

In order to be eligible for the holiday benefit, employees must meet the following criteria:

1. The employee must work the holiday if scheduled to do so, and must also work the scheduled shift before and the scheduled shift after the holiday.
2. If the holiday falls on a regular day off, the employee must still work the scheduled day before and scheduled day after the holiday to qualify for the holiday benefit.
3. Any absence for any reason from a scheduled qualifying shift will disqualify the employee from receiving the benefit.
4. Employees on leave of absence are not eligible to receive the holiday benefit.
5. If an employee's PTO coincides with a holiday, the employee's PTO account will not be charged for that day. Employees may not receive an amount greater than regular pay for taking a holiday off.
6. Holiday pay will not be used towards the calculation of overtime pay for any work week.

Hourly Benefit

All part-time, temporary, seasonal and on-call employees will receive one and one-half times their base pay for all hours worked between 12:01 a.m. and midnight on designated holidays. All full-time hourly staff will receive 8 hours at straight time or their normal shift equivalent for each eligible holiday regardless of whether the employee works or is scheduled off.

Salaried Benefit

Salaried employees do not receive additional compensation for working on holidays. However, salaried employees will typically be offered an opportunity to take an authorized day off on the holiday or after the holiday. Alternate days off must be used within two pay periods after the date of the holiday. Alternate holidays do not accrue and are not payable upon separation of employment, but rather are forfeited if not used within this time period.

Bereavement

All full-time employees are eligible to apply for bereavement pay immediately upon full-time employment with no waiting period, to attend to a death in their family. The time is typically used to attend memorial services or related matters and to grieve. Bereavement pay is typically authorized within one week following the death. Department Heads may grant additional time off at their discretion by approving other paid time off or unpaid leave, in accordance with the Nation's leave policies.

Definitions

Employees will receive up to 3 days of base pay for death of an immediate family member, defined as: spouse, child (including step children), parent (including step-parents, legal guardians, mother-in-law and father-in-law), siblings (including step-siblings and in-laws), grandparents, and grandchildren.

Employees are entitled to 1 day off with base pay for a death in their non-immediate family, defined as: aunt, uncle, niece, and nephew.

Jury Duty

This benefit applies to all Employees summoned to jury duty by any Federal, Tribal, State, or Local Court. Employees summoned to serve on Jury Duty must give as much advance notice of Jury service as possible by providing a copy of the summons to their Department Head or supervisor. Application for Jury Duty must be submitted in advance. Employees excused from Jury Duty must call their supervisor daily for reporting to work instructions.

Employees receive full base pay for up to 30 days of jury service. To qualify for this benefit, appropriate court documentation verifying each day of court service must be presented to the Department Head or supervisor. Jury duty is paid for only those days an Employee's presence is required at court and that coincide with the Employees regularly scheduled work days (including Employees who work evening shifts, if appropriate rest is not possible due to the jury service). The Nation may request documentation from the Court for verification of service.

Employees may retain any court payment for service on jury duty to defray any incidental expenses incurred as a result of the jury summons. Jury service does not count towards calculation of overtime pay.

Licensing & Background Check Requirements

All positions require some type of licensing and/or background check. The licensing staff in the Human Resources Department will coordinate any necessary license applications and background checks and notify employees of the outcome. Initial employment and/or promotional or transfer opportunities may be contingent upon the results of these licensures and background checks.

Conflict of Interest

All employees should do their best to avoid even the possible appearance of a conflict of interest. An actual or potential conflict of interest occurs when an Employee is in a position to influence a decision, as a result of the Nation's business dealings, that may result in a personal gain for that Employee or for a relative or individual with whom the Employee has a relationship. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the Employee is similar to that of persons who are related by blood or marriage. A dating relationship is defined as a relationship that may be reasonably expected to lead to the formation of a consensual romantic or sexual relationship.

Employees that have any influence on transactions involving or stand to personally benefit from purchases, contracts, or leases with the Nation, shall disclose to an officer of the Nation as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result not only in cases where an Employee or relative has a significant ownership in an outside business enterprise or firm with which the Nation does business, but also when an Employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving the Nation.

Any employee who has questions concerning possible conflicts of interest, should contact his/her supervisor to request advice. Human Resources will assist departments in determining if a conflict of interest exists.

Outside Employment

Any Employee who enters into any outside employment shall disclose this information in writing to his/her supervisors, using a Request for Outside Employment Form available at the Human Resources office. Human Resources will assist departments in determining if a conflict of interest exists.

Requests will be reviewed for approval by the department and Human Resources, and copies will be retained in the employment file. Outside employment shall not affect employee work efficiency or attendance or result in a violation of the conflict of interest policy set forth in this Guidebook. An Employee will be expected to end any outside employment or activity if it adversely affects his/her work.

Avoidance of Nepotism

Members of the same family are permitted to work at the Nation. The Nation will not hire, transfer or promote individuals whose employment would result in a supervisor/subordinate relationship or in a possible conflict of interest. Family is defined as: parent, spouse, child, sibling, grandparent, grandchild, aunt, uncle, first cousin, in-law or step relative.

The Nation requires applicants to list any relatives/family members that are currently employed by the Nation on the employment application or Employee Job Posting Form to ensure that applicants related to employees will be considered only for positions in accordance with the policy.

Additional restrictions may exist in departments where regulatory, ethical or operational challenges occur due to family members working too closely.

Should a close personal relationship exist or develop which may pose a conflict of interest, it is the Employee's responsibility to report this to his/her supervisors or Human Resources.

Dating in the Workplace

The Nation believes in an environment where employees maintain responsible boundaries between personal and professional relationships that are the most effective for business operations.

Any Employee in a supervisory position or other influential role, such as an employee who supervises, directs, evaluates, disciplines or influences other employees, shall disclose to their Department Head, Vice President or other Executive any dating, romantic or sexual relationship with a co-worker so that accommodations in the supervisory and/or reporting structure can be made to prevent potential impact on the work environment such as potential conflicts of interest.

Where potential impacts are identified, the organization will work with the affected employees involved to develop a structure for preventing conflicts of interest and adverse impacts upon the working environment. Refusal of a reasonable alternative to prevent potential conflicts of interest will be deemed a voluntary resignation.

Any Employee who is not in a supervisory or other influential role who has a dating, romantic, or sexual relationship with another employee should follow the guidelines below to maintain appropriate workplace conduct with responsible boundaries between the professional and personal relationship:

- Personal exchanges shall be limited so that others are not distracted from their work.
- Employees are prohibited from engaging in public displays of physical affection, including but not limited to kissing, embracing, and holding hands, while on duty.
- Employees working in the same department shall disclose their relationship to their Department Head.

Employees are expected to work cooperatively with the organization to resolve any workplace situation or issue that is a result of a dating or romantic relationship with a co-worker.

Release of Information

All requests for information on current or former employees must be referred to the Human Resources Department. Human Resources will verify dates of employment and position unless otherwise specified in writing by the employee and except as otherwise required by law.

Requests for employment information regarding employees and former employees will usually be provided in response to a court order. Such cases will be reviewed with the Nation's legal counsel on an individual basis. All personnel files are the property of the Oneida Indian Nation.

Employee File Review

An employee's employment records are property of the Nation, intended for use by the Nation. They are confidential except to the extent release may be required by law or in furtherance of the Nation's interests and include documents that pertain to the employee's performance, development, compensation, eligibility for employment, promotion or transfer, statutory and legal compliance documents, training records, as well as disciplinary and separation information. The file also contains information such as dates of employment, position, home address, and relevant work and emergency information.

An active employee may have the opportunity to review the contents of his or her employment file by contacting Human Resources and requesting an appointment to view the employment folder within the Human Resources Office.

If requested, active employees may be given copies of the following documents from their employee file:

- a. Performance Appraisals
- b. Corrective Counselings
- c. Performance Recognition documents
- d. Training Certificates

Department management may also view employment information for employees under their direct supervision or for employees being considered for positions within their department.

Changes in Personal Information

It is important that all employee records be up to date. All employees should promptly update personal information using the UKG self-service portal, or by notifying their Supervisors or the Human Resources Department of any changes in personal data.

The Human Resources Department requires current information for:

- Name
- Address
- Email address
- Telephone number
- Number of dependents
- Marital status
- Insurance beneficiary
- Tax withholding status
- Issues that affect an individual's gaming license status, where applicable
- Insurance related information
- Person(s) to contact in case of emergency with corresponding telephone numbers
- Beneficiary and dependent information

Separation from Employment

While we hope that all employees will have a long term working relationship with the Nation, we understand that circumstances arise which may result in separation of employment.

We request that employees wishing to leave the Nation provide a minimum two week's written notice to their Supervisor and/or the Human Resources Department. In an effort to facilitate a smooth transition, employees are asked not to take PTO during the two week notice period.

PTO balances will not be paid at separation to employees with less than one year of service. Maximum payout of unused PTO at separation is 160 hours. Reserve PTO and Paid Sick Time are not payable at separation. Additionally, no earned PTO will be paid upon separation to employees terminated due to misconduct. Any other unused benefits are not reimbursable.

Employees separating from employment will be mailed a statement of the status of their benefits. The statement outlines instructions for continuation of insurance coverage.

Unless specified otherwise, employees must return all Nation property on the last day of work and complete an Exit Interview with a representative from the Human Resources department. Employees are asked to settle any outstanding balances before leaving employment. The Nation will pursue any unresolved issues.

To facilitate distribution of year-end tax information and other important documents, it is imperative for employees separating employment to provide updated address information.

Breaks in Service

When an employee experiences a break in continuous employment with the Oneida Indian Nation, previous tenure with the Nation may be recognized for benefits as well as other purposes upon rehire. Employees with any break in service may be required to submit a new license and/or background information.

Reinstatement

When an employee separates employment with the Nation and returns to work within 30 days of the separation, the employee may be reinstated with no break in service and with no break in applicable benefit coverage. Reinstatement is afforded only to employees who left in good standing. All requests for reinstatement must be approved by the Vice President for Human Resources.

Benefits

Military Leave of Absence

The Nation recognizes the importance of the Military Reserve and National Guard, and permits leave for scheduled reserve duties. Military Leave is unpaid. Employees may choose to use earned paid time-off if they want to be paid while on Military Leave. All benefits continue consistent with the Nation's Family/Medical Leave policy.

Employees may be required to provide documentation that establishes length and character of the service to support their request for Military Leave as well as their application for reemployment.

Employees who enter military service after commencing employment with the Nation are granted an unpaid leave of absence. Employees continue to receive credit for service, earned PTO or leave. Upon honorable discharge, an employee will be reinstated in a position the employee might have reached had it not been for the intervening military service at the level of pay, benefits, seniority, and status commensurate with that position, *provided* such employee meets the following conditions:

- The employee must provide ONE notice that the employee intends to take leave for military service.
- The cumulative length of the employee's military service cannot exceed five years.
- If the leave exceeded 30 days, the employee makes timely reapplication for employment.
- If the leave exceeded 30 days and upon the Nation's request, the employee documents the timeliness of the reapplication and the duration of the leave.
- The employee's separation from military service was under "honorable conditions."

Family/Medical Leave (FML)

Family/Medical Leave is defined as a leave of absence from work due to any of the following reasons:

- Birth of a child to an employee
- Maternity or paternity leave in order to care for a child within 12 months of the child's birth
- Maternity or paternity leave in order to care for a child placed for adoption or foster care with the Employee within the first year of placement
- Care of the employee's child, spouse or parent with a serious health condition
- An employee's own serious health condition that makes them unable to perform the essential functions of their job or which qualifies the employee for New York State Disability or Worker's Compensation benefits
- Care of the employee's child, spouse, parent or next of kin who is a military service member with a serious injury or illness related to their active military service or a veteran with a serious injury or illness related to their active military service who has been discharged (other than dishonorably) from active military service no more than 5 years prior to the date the employee first seeks to take Family/Medical Leave
- Certain urgent family care situations arising from a Federally ordered call or impending call to active military duty in a foreign country for an employee's child, spouse or parent who is a military member or related to their participation in certain military events, rest & recuperation leave or post-deployment events

Under the Nation's policy, a serious health condition is defined as any condition that leaves the employee incapacitated for more than 3 calendar days and for which the employee is receiving continuing medical treatment or for which the employee received inpatient treatment at a hospital or health care facility. A serious health condition may also be defined as a chronic condition which results in periods of incapacity and for which an employee receives treatment from a health care provider at least twice per year. A serious health condition of a spouse, child or parent is any disability which renders the spouse, child or parent incapable of self-care. Care of a child may qualify even without a legal relationship if the employee provides proof of day-to-day responsibility and primary financial support for a child.

Qualified FML Eligibility

Other than as provided below, employees eligible for Qualified FML will be entitled to up to 12 work weeks of unpaid leave in a 12 month period measured forward from the date an employee's first FML is approved (the "Eligibility Period"). In instances where both spouses are employed by the Nation, leave for purposes of caring for a newborn or newly placed child or to care for a parent with a serious health condition may not combine to exceed 12 work weeks total for both spouses in an Eligibility Period.

Employees are eligible for 26 work weeks of Qualified FML in a single 12 month period for care of a spouse, child, parent or next of kin who is a military services member with a serious injury or illness related to their active military service and/or a veteran with a serious injury or illness related to their active military service who has been discharged (other than dishonorably) no more than 5 years prior to the date the employee first seeks to take FML. FML for care of a military service member may not combine with other FML to exceed 26 work weeks in a 12 month period.

The eligibility requirements for Qualified FML are:

- The employee must have been continuously employed for at least 12 months.
- The employee must have actually performed work for at least 1,250 hours during the year preceding the first day leave would begin. Absence from work for use of paid time off (PTO, sick pay, bereavement, jury service, etc.) or due to a disability or Workers' Compensation claim does not count toward calculation of the 1,250 hours, but does count toward calculation of the 12-months of employment.
- The employee must be employed at a work site within 75 miles of the Oneida Indian Nation Reservation (as recognized by the 1794 Treaty of Canandaigua.)

Employees on approved Qualified FML will be restored to an equivalent position, including their same schedule and work site or a close geographic work site at the end of an FML provided normal circumstances exist. However, an employee may not be entitled to be restored to an equivalent position, including their same schedule and work site or a close geographic work site under certain circumstances, including in the event there has been an elimination of the employee's position for reasons unrelated to taking Qualified FML or an elimination of a shift or decrease in original overtime hours. Employees who do not return to work after exhausting all Qualified FML will be separated from employment.

Non-Qualified FML Eligibility

Employees who do not meet the service eligibility requirements for Qualified FML may apply for FML in a non-qualified status, provided valid family or medical reasons exist (as outlined above). Only full-time and part-time employees who have completed their 90-day introductory period will be eligible for Non-Qualified FML. Employees may be granted up to 12 work weeks of Non-qualified FML in a rolling one year period. Employees with less than 90 days of service who require leave time may be asked to resign and reapply, or based on the circumstance, may be approved for a non-qualified FML with authorization from their department head and the Director of Human Resources.

The Nation does not guarantee the same position, status or schedule upon return from Non-Qualified Leave. Employees who do not return to work after exhausting all approved Non-Qualified FML will be separated from employment.

Initial Requests & Medical Certifications

Any FML request related to a serious health condition of an employee or the employee's spouse, parent or child, requires the completion of a Medical Certification Form. Medical Certification Forms are available in the Human Resources Department. The Nation reserves the right to require a second and possible third medical opinion. The Nation may also, at its discretion, accept qualification for New York State Disability benefits or Workers' Compensation benefits as appropriate certification of a serious health condition. The Nation requires written requests for foreseeable FML at least 30 days in advance. In cases of unforeseen circumstances or emergencies, the employee must request FML as soon as practicable, but preferably 48 hours in advance. The Nation reserves the right to require any documents necessary to confirm FML qualification. All medical certifications must be submitted to the Human Resources Department and will be treated confidentially. The Nation will provide employees with a written response to each leave request. If approved, the response will include the effective date of the approved leave.

Recertification

Employees must update their medical certification with the Human Resources Department periodically. Typically, recertification must be submitted at least every 30 days while on FML unless a physician indicates in the previous certification that the duration of the condition is more than 30 days. In any case, recertification will be required not less than every 6 months. Failure to provide updated medical certification within 15 days after the due date (or the last date of certified disability) may result in separation of employment. Medical information provided from the disability or worker's compensation carrier does not necessarily fulfill this requirement.

Payroll Deductions

Insurance coverage remains in effect during approved FML as if the employee was still reporting for work. The Nation continues to make employer contributions to the insurance premiums during approved FML. Employees must continue to make their contributions to keep coverage in place. The employee portion of the insurance premiums is deducted from the paycheck if earned paid time-off is paid during the leave. The Nation must receive a check from the employee for their portion of the employee insurance premiums by the regularly scheduled deduction date if unpaid leave time is taken. Employees must also ensure that any 401(k) loan payments are made during the leave period to avoid loan default. After 12 weeks on leave, employees are offered employee insurance continuation coverage at the full COBRA rates and the opportunity to port (transfer) or convert life insurance coverage.

The leave of absence approval letter shows the date the Nation must receive the check to keep insurance coverage in force. Employees who do not return from a leave of absence are responsible for reimbursing the Nation for their portion of the premiums paid on their behalf during the leave of absence unless their failure to return is the result of their serious health condition or other circumstances beyond their control.

All benefits resume upon return from FML (of less than 12 weeks) in the same manner and at the same levels as were in place before the leave. Employees who return within 12 weeks are not penalized in benefit entitlements or in the attendance policy for taking approved FML time.

Intermittent FML

In certain circumstances related to the treatment of an employee's own serious health condition or the serious health condition of an employee's spouse, child or parent, including a military services member with a serious injury or illness related to their active military service and/or a veteran with a serious injury or illness related to their active military service who has been discharged (other than dishonorably) no more than 5 years prior to the date the employee first seeks to take FML, and if medically necessary, Qualified FML may be granted intermittently. Approved intermittent FML combines with other FML for a maximum of 12 work weeks in an Eligibility Period (or 26 weeks, as applicable). If necessary, and based on planned medical treatment, an Employee's position or assignment may be adjusted to accommodate business needs during intermittent FML. All requests for intermittent FML will be reviewed by the Human Resources Department and specific provisions will be documented and signed by the employee and the Department Head. Employees must specifically advise their supervisor in each instance when approved Intermittent FML is requested to be applied to an absence.

Coordination of Paid Time-off with FML

Employees must use any available paid sick leave and/or PTO for all absences related to intermittent FML. Paid sick leave and PTO will be charged in the smallest increments allowed according to the policies for the applicable operating division. Employees will not be required to charge more paid sick leave or PTO than was used. Intermittent FML taken in increments smaller than available in the paid-time off policies will be unpaid. Employees must also use any available paid sick leave or PTO during the elimination period for disability or worker's compensation benefits. Paid sick leave and PTO can be used concurrently with non-intermittent FML at the employee's request. However, employees may not combine paid sick leave or PTO with other company-sponsored insurance benefits to exceed pre-disability income levels. The concurrent use of any paid time-off will not extend the approved leave period.

Any unused, earned PTO will be paid to the employee upon reaching the 12 week threshold,. Unused paid sick leave balances are forfeited at the time of separation. Unused PTO is paid at the time of separation in accordance with PTO policies.

Return from FML

Employees should notify Human Resources of their expected return date from FML as soon as possible, but at least 2 business days in advance of the requested return date. Employees who were placed on FML due to their own serious health condition must submit a medical certification outlining their ability to perform all essential functions of their jobs with or without reasonable accommodation. If advance notice of return is not provided, ONE will resume scheduling in the same or similar position within 3 calendar days of notification and submission of medical certification. Employees who do not request a return to work immediately after receiving a medical release may be separated from employment.

Other Employment

Employees who obtain employment elsewhere or begin an activity that will lead to gainful employment while on FML must immediately contact the Human Resources Department. Failure to contact the Human Resources Department with this information can lead to employment termination.

Presence on Nation Property

Employees on leave of absence are not allowed to participate in Nation-sponsored activities and events and should refrain from visiting their assigned worksite and casino properties. Employees may visit Human Resources or their supervisor in order to handle matters related to their leave.

The Nation shall not interfere with an employee's exercise of his or her rights protected under this FML policy and shall not terminate an employee, or otherwise retaliate against an employee, due to the employee's exercise of his or her rights protected under this FML policy.

Personal Leave of Absence

Employees who have valid reasons for unpaid leave, but are not eligible for a family or medical leave of absence as outlined under the FML Policy, may request personal leave time. Other than for military commitments, only full and part-time employees who have completed the 90-day orientation period are eligible for a personal leave of absence. Employees who request leave during their 90-day introductory period may be asked to resign and reapply, or based on the circumstances, may be approved for a leave of absence only with authorization from the Vice President for Human Resources.

Minimum requests should be for 7 calendar days. Personal leave may be approved for leave time up to 30 calendar days for personal reasons. Personal leave will not be granted for pursuit of other employment. If the employee does not return by the approved return date, there is no guarantee of reassignment to the previous position. Any possible exceptions to this policy must be approved by the Vice President for Human Resources.

Employees must submit written requests to Human Resources and their Department for foreseeable personal leaves of absence at least 30 days in advance. Requests must include the effective date, return date, and reason for leave.

Typically, benefits will remain in effect during approved personal leave periods; however the Nation reserves the right to discontinue insurance benefits if an employee has exhausted other forms of leave available. Employees must make arrangements with Human Resources prior to the effective date of a personal leave to pay their normal insurance paycheck deductions while on personal leave. Employees who fail to return from personal leave as scheduled will be separated from employment and offered health insurance continuation coverage at the COBRA rate.\

Return from Personal Leave & Extension Requests

Employees who do not expect to return from personal leave on the scheduled date, must submit a written request in advance to their department and Human Resources for an extension. The Nation is not obligated to extend a personal leave beyond the time stated. Any extension beyond the time originally approved must be authorized by the Vice President for Human Resources. Employees who fail to return on the approved date will be terminated for job abandonment.

Coordination of Paid Time-off with Personal Leave

All personal leave is unpaid. Employees will be required to exhaust all earned PTO, prior to being approved for unpaid personal leave.

Other Employment

Employees who become employed elsewhere or begin an activity that will lead to gainful employment elsewhere while on family or personal leave must immediately contact the Human Resources Department. Failure to contact the Human Resources Department with this information can lead to employment termination.

Presence on Nation Property

Employees on personal leave of absence are not allowed to participate in Nation-sponsored activities and events and should refrain from visiting their assigned worksite and casino properties. Employees may visit Human Resources or their supervisor in order to handle matters related to their leave.

Life Insurance

Life insurance is offered to all full-time eligible employees at no cost. Eligible employees may elect supplemental insurance at competitive group rates. A written election or declination is required for all life insurance coverage. For more details about the life insurance coverage, please contact the Human Resources Department.

Retirement Savings

All employees are immediately eligible to participate in the Nation's 401k retirement plan upon hire. Pre-tax contributions are made through payroll deduction, and after meeting certain eligibility requirements, the Nation will generously match 5% of the employee's contributions. For more details about the 401k plan, please contact the Human Resources Department.\

Medical and Dental Insurance

The Nation offers pre-tax medical insurance (including vision and prescription coverage) and dental insurance to all full-time employees and their legal dependents. Waiting periods for this coverage may apply. Employees will pay their portion of the cost via an authorized payroll deduction. Applicable payroll deductions will begin on the first full pay period following the coverage effective date and will continue through any full or partial pay period for which coverage is in effect. All eligible Employees are required to make a written election or declination of this coverage. Participants who do not have a deduction for any reason (i.e. absence or insufficient funds) must make arrangements with the Human Resources Department to pay their portion of the premium in order to keep coverage in force. For more details about the applicable waiting periods, coverages available and cost of such coverages, please contact the Human Resources Department.

Employee Assistance Programs (EAP)

It is the Nation's hope to inspire and enlighten all employees to make healthier choices in all facets of physical and mental well-being, including substance abuse, personal and family counseling, and more. Employee Assistance Programs (EAP) offer educational insights and helpful everyday tips to help you on your road to a happier, healthier you!

Our Employee Assistance Programs, offered by BRiDGES EAP and UNUM Life Balance, provide advocacy, resources, and services to our employees and their families through the delivery of prevention and intervention programs that promote change, strengthen families, and build healthy communities. This network of free services is available to Nation employees and their families to help cope with issues experienced in everyday life. Services include short-term confidential counseling, wellness resources and tools to help you be successful in the workplace.

Paid Family Leave

The Nation provides Paid Family Leave (PFL) to eligible employees, which provides a certain amount of paid leave within a 52-week period to bond with a new child, care for a close relative with a serious health condition, or help relieve family pressures when someone is deployed abroad on active military service. The Nation will use an insurance company or other third party to administer PFL claims and pay PFL benefits. Premiums for PFL coverage with the Nation are paid for through employee payroll deductions. Employees on approved PFL will be restored to their same or comparable job upon return from PFL and are guaranteed continued health insurance and other voluntary insurance coverage while on PFL as long as they continue to pay the required employee contributions or premiums during PFL.

PFL Benefits: The maximum leave benefit effective beginning 2021 and beyond is:

Year	Weeks of Leave	Benefit
2021 and beyond	12 weeks	67% of employee's Average Weekly Wages, up to 67% of the NYS Average Weekly Wages

PFL taken with all employers during the 52 week period is considered in determining the weeks of leave. Use of PFL will not count in the calculation of overtime and payment of PFL benefits is not included in the calculation of wage-based benefits. PFL may be used intermittently within a 52 week period to care for a family member with a serious health condition when medically necessary, but may not be used in increments of less than one work day.

Eligibility for PFL Benefits: Employees residing in New York State with a regular work schedule of 20 or more hours per week are eligible after 26 weeks worked. Employees with a regular work schedule of less than 20 hours per week are eligible after 175 days worked. The 52 week period used to determine eligibility will be measured by looking back 52 weeks from the start date of the PFL. In limited circumstances, employees who are not reasonably expected to meet these eligibility requirements due to seasonality or on-call status, may waive PFL coverage.

Employees who qualify for PFL and disability benefits may not combine PFL with disability benefits for the same period of time and may not take more than 26 total weeks of PFL and disability benefits in a 52-week period. Employees who qualify for both Family Medical Leave (FML) and PFL must use the leave concurrently, but may not combine FML and PFL to take more than 12 weeks of family medical leave or receive paid leave in excess of the maximum duration allowed. At the employee's request, available Paid Time-Off or Sick Pay may be used during PFL, but will not combine with PFL benefits to exceed the employee's pre-leave income levels.

Claims: A claim for PFL will be approved or denied within 18 days of submission. Employees requesting PFL should provide the Nation with at least 30 days' notice before the leave is to begin if the leave is foreseeable (e.g., birth, adoption, foster care, planned medical treatment, known military exigency). If the leave is not foreseeable, Employees should provide notice as soon as practicable. Please contact Human Resources for information on how to file a claim for PFL benefits or with any questions regarding your payroll deductions for PFL premiums.

Disability Insurance

The Nation participates in the New York State Short Term Disability Program. The Nation also sponsors supplemental short-term disability insurance at no cost to employees and offers full-time employees the option to purchase long-term disability insurance. Disability insurance pays a portion of the employee's wages when employees are absent from work due to a non-work related injury or illness. Information and claim forms are available from Human Resources.

Workers' Compensation Insurance

The Oneida Indian Nation has established a Workers' Compensation program to provide coverage for employees who experience a valid work-related injury or illness. This coverage is administered by a third party provider. Workers' Compensation benefits include payment of related medical expenses and replacement of wages. It is very important for employees to report any work related injury or illness to their supervisor immediately. Further details and information are available from Human Resources or at the following website address: <http://www.oneidaindiannation.com/ordinances-regulations/>

Employee Performance Management

Performance Appraisals

Performance Appraisals are used to record and recognize performance results and assess an employee's need for further training and development. A performance evaluation provides a measurement of how an employee is doing and what performance goals should be set for the next period. The topics covered in the review include capability in the current position, attainment of performance standards, commitment to the Nation's Core Values, and a review of the Personal Development Plan.

All full-time and part-time employees are eligible for three types of performance appraisals:

1. Introductory: Appraisals during the introduction period (typically within the first three to six months of employment or promotion).
2. Mid-Year: Appraisals conducted in April of each year.
3. Annual: Appraisals conducted in October of each year.

On-call, temporary and seasonal employees will not receive performance appraisals on a set schedule, but will be evaluated periodically, taking into account length of time in their positions and frequency of work. Employees who do not meet minimum standards of performance as documented in their appraisal may be reassigned, separated from employment or given an action plan for further evaluation. Failure to improve on documented areas may result in separation of employment.

Supervisors will provide employees with a copy of their performance appraisal at the time of the performance appraisal meeting. Employees may attach additional written comments to their appraisal.

Employees sign all performance reviews in order to acknowledge receipt of them.

An employee's performance appraisal date may be adjusted with any period of absence.

Training

Oneida Indian Nation recognizes its responsibility to support the success of its employees. One of the ways the Nation demonstrates its commitment is through providing growth and development opportunities through training. Our goal is to provide classes for all employees that support individual learning both professionally and personally.

To support employees in creating a plan to attend classes, training calendars listing the class offerings, times and locations are available on the employee intranet or from Human Resources. Every employee is encouraged to select and attend classes for personal development. Also, with the support of managers and supervisors, a process for development of each employee may require attendance at selected training classes based on the individual's development plan as outlined in their performance appraisal. Those in leadership roles are expected to participate in all programs designed for leaders.

Internal Development

The Nation is committed to assisting our employees in achieving their career goals. The Nation has developed policies and will work to accommodate employees who wish to enhance their educational attainment.

Additionally, the Nation tries to promote from within. Decisions to promote will be based on an employee's entire employment record, including skills, performance, cooperation with colleagues, efficiency, attendance record, experience, responsiveness to guests and other employees, disciplinary record and safety record.

Tuition Assistance Program

The Oneida Indian Nation encourages the improvement of employee knowledge and skills through education and by providing the incentive of financial assistance.

Courses must be approved 30 days in advance by the Department Head and the Vice President for Human Resources. It is the responsibility of the employee to provide documentation that the educational institution is appropriately accredited. This documentation must be submitted along with the Application for Tuition Assistance.

Eligibility Criteria

To be eligible for educational financial assistance, employees must meet the following criteria:

- A minimum of one year of full-time service at the time of application
- Satisfactory or better job performance ratings before and during school enrollment
- Satisfactory attendance and no formal written level counselings (excluding variances) for the prior twelve months and during school enrollment
- The proposed course of instruction must be directly related to the employee's position or requirements for advancement within the organization
- Department Head's recommendation based on overall assessment of the employee's documented work record
- Must receive a grade of "C" or above

Upon satisfaction of these criteria, 75% of allowable expenses, up to the policy maximum, may be reimbursed each year. For more information regarding tuition reimbursement, contact Human Resources, Training Department.

Elements of Our Compensation Practices

Pay Periods

Pay periods are measured over a two week timeframe starting with shift start times after 12:01 a.m. on Mondays and ending with shifts starting prior to 12:00 midnight on Sundays. Employees are paid every other week on Fridays immediately following the end of the pay period (Sundays).

Paycheck Distribution

Paychecks are mailed to the employee's personal address as provided to Human Resources. Employees should review their paychecks for important information or any potential discrepancies and report any errors immediately to their supervisor.

Employees are encouraged to participate in Direct Deposit of payroll funds to the bank account of their choosing. Direct Deposit offers security and convenience. Easy on-line access to paystubs, pay information and tax information is available through the UKG self-service portal. Pay cards are also available as a convenient and secure option.

Salary/Wage Administration

The Nation values all employees and their contributions and strives to achieve competitive pay levels relative to similar positions in other local employers and the industry. All positions have a designated starting pay rate or an assigned pay range that has been established based on relevant labor market data and evaluation of internal factors. Every position has a pay rate maximum to maintain cost controls and to distinguish between position pay levels. Employees who reach the position rate maximum will not receive additional increases to base pay unless an adjustment to the established compensation level is approved based on market data or other cost considerations.

Compensation Market Assessment

The Nation will conduct compensation market assessments periodically with the goal of maintaining competitive pay and benefits.

Overtime Calculation

Positions classified as non-exempt will be eligible for overtime compensation calculated at one-and-one-half times the regular base pay rate, for hours actually worked over 40 hours within the pay week. Employees may not incur overtime hours without advance approval from their supervisor. PTO and other leave time do not count toward the 40 hour calculation.

Meal Periods and Other Breaks

Employees working for more than 6 hours consecutively will receive a 30-minute meal break during the scheduled shift. Employees cannot work through this time. Employees must consume meals in designated areas. Meal breaks may be paid or unpaid, depending on the policy in place at the assigned work location. Employees who work a shift of more than 10 consecutive hours will be scheduled for an additional meal period. The Supervisor will provide information about any additional meal time.

Other breaks will be determined by the operational needs of the particular department and will be communicated by the Supervisor for the area, but will be applied consistently for all employees in the area.

Each Department has the discretion to adjust and/or limit the number of non-meal breaks to accommodate the Nation's business needs, emergencies or for special circumstances.

Minimum Reporting Pay

There may be times when an employee is called at home and asked not to report. If an employee is not contacted in advance and is subsequently required to leave work, the Nation will provide a minimum payment of 4 hours of base pay to compensate the employee for reporting to work (assuming the scheduled shift exceeded 4 hours). Departments will make any manual adjustments necessary to time and attendance records to ensure this compensation level is maintained.

Transfers/Promotions

Employees who transfer between positions or departments will generally receive compensation adjustments within the following guidelines:

1. Any employee transferring to a new position will start at the minimum or starting rate for the position, unless the employee is working in a position with materially similar functions. A new performance appraisal date will also be assigned (if applicable).
2. Employees transferring to positions with a lower pay range than their current position will receive the starting rate or range minimum for the new position, unless previous experience in the same department or in similar functions warrants a rate above the minimum. Any transfer to a new department will result in a change to the performance appraisal date (if applicable).
3. Employees who transfer or are promoted to positions with a higher pay range than their current position will generally receive the minimum of the new range or at least a 4% increase in base pay. Any transfer from a non-supervisory to a supervisory position will typically result in at least a 5% increase in base pay.
4. Transfers or promotions will take effect as soon as possible after the selection date as operational needs permit, but usually not longer than 4 weeks.

Employment Status

Full-time:

A Full-time employee:

- has an indefinite period of employment
- is regularly scheduled and available for 40 hours per week (or 80 hours per pay period)
- works an average of 60 hours or more per pay period, measured quarterly

Employees who transfer out of full-time status lose qualification for full-time benefits.

Employees who do not meet the above criteria for full-time classification will be transferred to the appropriate classification and full-time benefits eligibility may be affected.

Part-time:

A part-time employee:

- has an indefinite period of employment
- has a regular weekly schedule
- works an average of 16 or more hours but less than 60 hours per pay period, measured quarterly

Part-time employees who transfer to full-time positions must complete a 90-day waiting period to qualify for applicable insurance benefits. The date of transfer from part-time to full-time is the date of status change.

Part-time employees who are not available to work when requested may be removed from the schedule and considered to have resigned from employment.

Temporary/Seasonal:

A temporary/seasonal employee:

- works any number of hours, but for periods of less than one year
- is not eligible to participate in insurance benefit programs

Temporary and Seasonal Employees whose assignment exceeds one year will be changed to the appropriate employment classification.

On-call:

An on-call employee:

- has an indefinite period of employment
- averages less than 16 hours per pay period
- works as needed to staff specific events or projects, to cover for absences of regular, full-time and part-time staff or to meet short-term business volumes
- is not eligible to participate insurance benefit programs

On-call employees are required to work at least one event or shift every six months (measured January 1 to June 30 and July 1 to December 31 of each calendar year) to maintain their employment status. On-call employees who are consistently not available when called to work will be considered to have resigned employment. On-call employees who work an average of more than 15 hours per pay period over successive calendar quarters will be changed to the appropriate employment classification.

The Human Resources department will monitor actual work hours of employees to ensure consistency with classification definitions and advise all employees accordingly should there be an issue related to potential loss of benefits.

Problem Resolution Process

The Oneida Indian Nation believes that it is the tradition of the Oneida Way to communicate directly with employees. We will constantly strive to maintain a culture in which our employees are comfortable coming to us with their issues and concerns knowing that they will be handled with care, respect, consistency and fairness. Our ability to communicate effectively and directly with our employees is one of the most important aspects of our employee relations philosophy. However, we realize that some issues may arise that may require a more formal resolution process. In an effort to resolve problems proactively, employees are encouraged to take the steps outlined below:

Step 1:

The employee is encouraged to review the problem/complaint with his/her immediate supervisor. If the problem is with the supervisor, the employee is encouraged to discuss the issue with the department manager or Director to try to resolve the problem. If after these discussions, the employee is not satisfied with the outcome, then a Human Resources Advisor may be contacted for problem resolution support. If the issue is a termination for cause, the employee can proceed to Step 2 of this process, by-passing step 1.

Step 2:

The Human Resources Advisor, Employee Relations Manager, or Director of Employee Relations will attempt to mediate the problem/complaint between the employee and the department. If it is a termination, the Human Resources Advisor, Employee Relations Manager, or Director or Employee Relations will facilitate a review of the decision with the Department Head.

Step 3:

If the Human Resources Advisor, Employer Relations Manager or Director of Employee Relations believes there is merit to the employee's problem/complaint and is unable to resolve it with the department, the Human Resources Advisor, Employee Relations Manager, or Director of Employee Relations will refer the matter along with a recommendation to the Vice President for Human Resources. The Vice President for Human Resources will attempt to resolve it with the department. If the issue is a termination, the Human Resources Advisor, Employee Relations Manager, or Director of Employee Relations will submit a fact summary along with recommendations to the Vice President for Human Resources.

Step 4:

If the Vice President for Human Resources is unable to resolve the issue with the department, the Vice President for Human Resources will involve the Chief Operating Officer, as appropriate.

Step 5:

Final executive review for any valid employee problem/complaint including a disputed termination for cause is done through the office of the Chief Executive Officer or his designee. As the executive review authority, the Chief Executive Officer will make a final and appropriate disposition.

Note:

- A. Each employee utilizing the Problem Resolution Process will be advised after each step as to the determination made concerning their specific problem/complaint. This will be done either by the supervisor, the Human Resources Advisor, Employee Relations Manager, Director of Employee Relations or the Vice President for Human Resources.
- B. Each employee is encouraged to furnish the appropriate documentation for each step in the Problem Resolution Process. Should the employee fail to provide requested information, ONE may terminate review of the employee's complaint or take other appropriate action.

- C. The Human Resources Advisor, Employee Relations Manager, or Director of Employee Relations will document the outcome of Steps 1, 2, and 3 of this process. When disposition is made at Step 4, the Human Resources Advisor, Employee Relations Manager, or Director of Employee Relations will advise the employee in writing as to the outcome.

Our Environment

The Oneida Indian Nation strives to participate in recycling programs and resource conservation. The Nation also makes significant effort to integrate its development with the surrounding natural habitat and wildlife.

We encourage employees to share in this environmentally conscious approach.

Workplace Safety

The Oneida Indian Nation strives to maintain a safe and hazard-free work environment for all employees. The Nation offers regular defensive driving courses, job specific safety training and guidelines for safe handling of materials to all employees.

Any accident or injury involving an employee or a patron should be immediately reported to a supervisor.

Employees will receive safety training during the orientation period and periodically throughout the employment period. During this training period, employees will be directed regarding safety practices for their position, as well as the location and appropriate use of personal protective equipment. Should there be any questions with respect to locations for fire extinguishers, personal protective equipment, evacuation procedures or other safety issues, they should be brought to the attention of the supervisor or the Human Resources Department so that the Nation can ensure an efficient and immediate response.



ONEIDA NATION ENTERPRISES

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