

## **Non-Harassment Policy**

### 1. Harassment Policy Statement

As indicated above, the Company is committed to providing a work environment that is free of unlawful discrimination. This policy includes the prohibition of harassment based upon any of the characteristics listed in our Equal Employment Opportunity Policy above. Many alleged harassment situations in the work environment involve sexual harassment. However, complaints alleging harassment based upon other protected characteristics will be handled in the same manner as complaints alleging sexual harassment. The “work environment” includes all of the Company’s premises, and any other locations where Company-sponsored activities take place, any off-site location where Company business is conducted, and on social networking sites if the Company, its customers, suppliers, or employees are referenced or included in communications. “Sexual harassment” is defined as:

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- a. Submission to such conduct is made a term or condition, either explicitly or implicitly, of an individual’s employment;
- b. Submission to or rejection of such conduct by an individual is used as a factor in decisions affecting that individual’s employment; or
- c. Such conduct has the purpose or effect of substantially interfering with an individual’s work performance or creates an intimidating, hostile, or offensive work environment, and the Company knew or should have known of the existence of the harassment and failed to take timely and appropriate action.

If you believe that you are being subjected to harassment, you must:

- First: Tell the harasser to stop if you are comfortable doing so.
- Second: Make a record and immediately report the incident to your supervisor or to the Executive Director.
- Third: If the conduct continues, this should also be immediately reported to the above individuals.

Any reported incident will be discretely investigated. Complaints and actions taken to resolve alleged harassment will be handled as confidentially as possible, given the Company’s obligation to investigate and act upon reports of such harassment. Employees may bring complaints, ask questions, and raise concerns without fear of reprisal under this policy. All employees are responsible for understanding, adhering to, and strictly enforcing this policy. Any violation of this policy may result in discipline, up to and including termination. Making false allegations is also a violation of this policy.

## 2. Investigation and Recommendation

The Company will, upon receipt of a report or complaint alleging harassment or other inappropriate conduct, authorize an investigation.

In determining whether the alleged conduct constitutes inappropriate conduct, the Company may consider the surrounding circumstances, the nature of the alleged statements or conduct, the relationships between the parties involved, and the context in which the alleged incidents occurred. Whether a particular action or incident constitutes inappropriate conduct requires consideration of all the facts and surrounding circumstances.

The investigation may consist of personal interviews with the complainant, the individual(s) against whom the complaint or report is filed, and others who may have knowledge of the alleged incident(s) or circumstances giving rise to the complaint or report. The investigation may also include any other lawful methods deemed pertinent by the investigator.

In addition, the Company may take immediate steps, at its discretion, to protect the complainant, witnesses, or other employees pending completion of an investigation.

## 3. Prohibition Against Retaliation

Employees shall not retaliate against any person who complains of or reports alleged harassment or other inappropriate conduct or retaliate against any person who testifies, assists, or participates in an investigation, proceeding, or hearing relating to a harassment complaint.

## 4. Discipline and Other Appropriate Action

The Company may take any appropriate action it deems necessary in response to complaints which are confirmed by investigation or for other violations of this policy. Such action may include: discipline, such as verbal or written warnings; paid or unpaid suspensions; demotions; transfers; ineligibility for promotions, benefits, or raises; counseling or other required conditions for retaining employment; termination; as well as general reminders of this policy.

