

## **WORKPLACE HARASSMENT POLICY**

ABC Company is committed to providing a work environment that maintains employee equality, respect and dignity. In keeping with this commitment, ABC Company maintains a strict policy prohibiting any form of unlawful employee harassment based on race, color, age, religion, sex, pregnancy, marital status, familial status, disability, national origin, sexual orientation, veteran status, status with regard to public assistance or activity in a local human rights commission, or other applicable status protected by federal, state or local laws. Harassment, whether verbal, physical or environmental, and whether in the workplace or in outside work-sponsored settings, is unacceptable and will not be tolerated.

Sexual harassment is illegal under federal, state and local laws, and applies equally to men and women. It is defined in the Equal Employment Opportunity Commission (EEOC) Guidelines as any unwelcome sexual advance, request for sexual favor, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. These behaviors may include, but are not limited to: subtle or overt pressure for sexual favors; derogatory or vulgar statements regarding one's sexuality or gender; unnecessary touching, patting, pinching or attention; innuendoes, suggestions or jokes; turning work discussions into sexual topics; or displaying sexually suggestive visual materials.

If you believe that you have been subjected to or have witnessed any form of harassment, you should immediately contact an appropriate manager, supervisor or Human Resources staff. If the complaint is regarding a manager or supervisor, contact Human Resources. The complaint will be immediately and thoroughly investigated in a professional manner. There will be no retaliation against any employee who files a complaint in good faith or who assists in providing information relevant to a claim of harassment, even if the investigation produces insufficient evidence to support the complaint. If the facts and results of the investigation substantiate the complaint, then the appropriate corrective action will be taken, up to and including termination.

Confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances, to protect the privacy of persons involved. Investigation may include interviews with the parties involved and, where necessary, individuals who may have observed the alleged conduct or who may have relevant knowledge.

This policy applies to all employees (managers, supervisors and staff), whether related to conduct engaged in by fellow employees, supervisors, or someone not directly connected to ABC Company (e.g., outside vendors, consultants, clients, etc.). ABC Company will make every reasonable effort to ensure that its entire population is familiar with this policy and is aware that every complaint received will be investigated and resolved appropriately. ABC Company encourages reporting of all perceived incidents of sexual harassment, regardless of who the offender may be. Every employee is encouraged to raise any questions or concerns with Human Resources.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination of employment, and may include such

other forms of corrective action as we deem appropriate under the circumstances and in accordance with applicable law.

ABC Company recognizes that false accusations can have serious effects on innocent persons. If an investigation results in a finding that a person who has accused another of a violation of this policy has maliciously or recklessly made false accusations, the accuser will be subject to appropriate corrective action, up to and including termination.

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with the appropriate government agency. Using our complaint process does not prohibit you from filing a complaint with these agencies.