

| | | |
|---------------------------------|--------|--------------------------------------|
| Written: 03/09/2017 | Policy | Harassment/Non-Discrimination Policy |
| Approved: 04/27/2017 | | Dept.: All |
| Reviewed/Revised: 03/09/2017 | | Written By: Logan Brown |

Policy

Area Agency on Aging, Inc. is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Area Agency on Aging, Inc. expects that all relationships among persons will be free of bias, prejudice and harassment. Although harassment based on sex is included in this policy and prohibited, there is also a more in depth Sexual Harassment Policy that should also be referred to in case of Sexual Harassment.

Equal Employment Opportunity

It is the policy of Area Agency on Aging, Inc. to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law. Area Agency on Aging, Inc. prohibits any such discrimination or harassment.

Retaliation

Area Agency on Aging, Inc. encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Area Agency on Aging, Inc. to promptly and thoroughly investigate such reports. Area Agency on Aging, Inc. prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.

Harassment

Harassment on the basis of any protected characteristic is strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, or that of his or her relatives, friends or associates, and that: a) has the purpose or effect of creating an intimidating, hostile or offensive work environment, b) has the purpose or effect of unreasonably interfering with an individual’s work performance, or c) otherwise adversely affects an individual’s employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer’s premises or circulated in the workplace, on company time or using company equipment by e-mail, phone (including voice messages), text messages, social networking sites or other means.

| | | |
|---------------------------------|--------|--------------------------------------|
| Written: 03/09/2017 | Policy | Harassment/Non-Discrimination Policy |
| Approved: 04/27/2017 | | Dept.: All |
| Reviewed/Revised: 03/09/2017 | | Written By: Logan Brown |

Individuals and Conduct Covered

These policies apply to all applicants and employees, whether related to conduct engaged in by fellow employees or by someone not directly connected to Area Agency on Aging, Inc. (e.g., an outside vendor, consultant or customer).

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

Reporting an Incident of Harassment, Discrimination or Retaliation

Area Agency on Aging, Inc. encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender’s identity or position. Individuals who believe that they have been the victim of such conduct should discuss their concerns with their immediate supervisor, any member of management or the human resources (HR) director. See complaint procedure described below.

In addition, Area Agency on Aging, Inc. encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and to request that it be discontinued. Often this action alone will resolve the problem. Area Agency on Aging, Inc. recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

Complaint Procedure

Individuals who believe they have been the victims of conduct prohibited by this policy or believe they have witnessed such conduct should discuss their concerns with their immediate supervisor, human resources (HR) director or any member of management.

Area Agency on Aging, Inc. encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore, while no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

| | | |
|---------------------------------|--------|--------------------------------------|
| Written: 03/09/2017 | Policy | Harassment/Non-Discrimination Policy |
| Approved: 04/27/2017 | | Dept.: All |
| Reviewed/Revised: 03/09/2017 | | Written By: Logan Brown |

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling or disciplinary action such as a warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay, or termination, as the company believes appropriate under the circumstances.

False and malicious complaints of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of appropriate disciplinary action.