



## **Objective**

Leadership For Execs is committed to a work environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Leadership For Execs expects that all relationships among persons in the office, outside of the office, and virtual settings will be business-like and free of explicit bias, prejudice, and harassment.

Leadership For Execs has developed this policy to ensure that all its employees can work in an environment free from unlawful harassment, discrimination, and retaliation. Leadership For Execs will make every reasonable effort to ensure that all concerned are familiar with these policies and are aware that any complaint in violation of such policies will be investigated and resolved appropriately.

Any employee who has questions or concerns about these policies should talk with the Chief of Staff or a member of the human resources department.

These policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender or any other protected status from participating in business or work-related social activities or discussions. In other words, no one should make the mistake of engaging in discrimination or exclusion to avoid allegations of harassment. The law and the policies of Leadership For Execs prohibit disparate treatment based on any protected status, regarding terms, conditions, privileges, and perquisites of employment or contract work. The prohibitions against harassment, discrimination, and retaliation are intended to complement and further those policies, not to form the basis of an exception to them.

## **Equal employment opportunity**

It is the policy of Leadership For Execs to ensure equal employment or contract opportunity without discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, genetic information, or any other protected status by law. Leadership For Execs prohibits any such discrimination or harassment.



## **Retaliation**

Leadership For Execs encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Leadership For Execs to investigate such reports promptly and thoroughly. Leadership For Execs prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.

## **Sexual harassment**

1. Sexual harassment constitutes discrimination and is illegal under federal, state, and local laws. For this policy, "sexual harassment" is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when, for example: 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 individuals.
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.

Title VII of the Civil Rights Act of 1964 recognizes two types of sexual harassment: a) quid pro quo and b) hostile work environment. Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.



## **Harassment**

1. Harassment based on any other protected status is also strictly prohibited. Under this policy, harassment is verbal, written, or physical conduct that denigrates or shows hostility or aversion toward an individual because of their race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other status protected by law, or that of their relatives, friends or associates, and that: Has the purpose or effect of creating an intimidating, hostile, or offensive work environment.
2. Has the purpose or effect of unreasonably interfering with an individual's work performance.
3. 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.

## **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 Leadership For Execs (e.g., an outside vendor, consultant, contractor, 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, virtual meetings, business meetings, and business-related social events.

## **Reporting an Incident of Harassment, Discrimination or Retaliation**

Leadership For Execs encourages reporting 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 the Chief of Staff or any member of human resources. See the complaint procedure described below.

In addition, Leadership For Execs encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that their behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. Leadership For Execs recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.



## **Complaint Procedure**

Individuals who feel they have been the victims of behavior prohibited by this policy or believe they have witnessed such conduct should discuss their concerns with the Chief of Staff or member of human resources.

Leadership For Execs 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.

Leadership For Execs will maintain confidentiality 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. Like harassment or discrimination, itself, will be subject to disciplinary action. Therefore, 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, or termination of employment or contractual relationship, as Leadership For Execs believes appropriate under the circumstances.

If a party to a complaint does not agree with its resolution, that party may appeal to Leadership For Execs' Chief Executive Officer.

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.