

The Xenia Institute's Non-Discrimination, Anti-Harassment, and Whistleblower Protection Policies

Statement of Non-Discrimination

The institute is committed to a policy of equal employment opportunity for all persons without regard to race, color, creed, gender, religion, age, national origin, sexual orientation, political affiliation, physical or mental disability, pregnancy, personal appearance, marital or family status, or other status as protected by State and Federal laws. It is our intention to promote the full realization of equality in opportunity and employment. Employment decisions address the ability of persons to perform their jobs consistent with the business needs of the organization.

This policy applies to all terms, conditions, and privileges of employment, including: performance appraisals, benefits, compensation, disciplinary action, hiring, promotions, transfers, terminations, rehires, training, educational assistance, and working conditions. Accordingly, employment related decisions made on behalf of the organization by an employee, consultant, or authorized representative of the institute must be accomplished on a non-discriminatory basis. Employees are also protected against retaliation for opposing unlawful discrimination. All institute employees are expected to give full support to the prevention of all forms of discrimination in the workplace.

Non-Discrimination Against Persons With Disabilities

In accordance with all applicable Federal and State laws, the institute endeavors to ensure that qualified individuals with disabilities are not discriminated against with regard to job application procedures, hiring, advancement, discharge, compensation, job training, or other terms, conditions, or privileges of employment.

It is the responsibility of the individual with a disability to request of the institute any reasonable accommodation that may enable that person to fulfill the essential functions of his or her job. All requests for such accommodation will be considered on a case-by-case basis.

Any employee who believes that he or she has been discriminated against as a result of having or reporting a disability should report such a complaint to the executive Director. All reported complaints will be handled in accordance with the institute's Discrimination Complaint Procedure.

Unlawful Harassment

The institute intends to provide a work environment in which all employees are treated with courtesy, dignity and respect. This includes an environment free of harassment of any kind.

Harassment is a form of misconduct that undermines the integrity of the employment relationship and demeans all parties. Harassment in any form, including verbal, physical or sexual is prohibited. Some examples of harassment are:

- verbal misconduct such as epithets, derogatory comments, slurs, unwanted sexual comments, advances, or invitations
- visual conduct such as derogatory posters, photography, cartoons, drawings, or gestures
- physical conduct such as assault, unwanted touching, blocking normal movement patterns, or interfering with work
- threats or demands including warnings of physical harm or demands to submit to requests for sexual favors in order to keep one's job, to advance in position, or to avoid loss of job benefits
- retaliation, revenge, or retribution for threatening to report or having reported harassment

Any such conduct that interferes with an employee's ability to work, creates an intimidating, hostile, or offensive work environment, or that impairs an employee's well being is considered harassment.

The institute's harassment policy applies to all employees, including officers, managers, supervisors, co-workers, vendors, and consultants. Any employee found in violation of this policy is subject to disciplinary action up to and including termination.

Sexual Harassment

Although sexual harassment is described under unlawful harassment, it warrants additional clarification. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal, visual, written or physical conduct of a sexual nature, in which such conduct is either an explicit or implicit term or condition of employment or is used as the basis for employment decisions.

In general terms, sexual harassment is conduct such as deliberate, repeated, unsolicited or unwelcome verbal comments, sexual jokes or ridicule, physical gestures or actions of a sexual nature, leering, staring, solicitations for sexual favors, or creating a hostile work environment through the practice of such actions. Sexual harassment can also take the form of suggestive comments, demands for sex, dirty jokes, and physical touching or horseplay. Any unwelcome verbal, written, visual, or physical conduct of a sexual or gender-specific nature constitutes sexual harassment and will not be tolerated by any employee.

Whistleblower Protection

A whistleblower is an employee who informs a supervisor or the Executive Director about an activity which he or she believes to be fraudulent or dishonest. The institute will make its best effort to protect whistleblowers against retaliation. It cannot guarantee confidentiality, however, and no reports will be off the record or unofficial. Confidentiality will be maintained unless the employee agrees to be identified, identification is necessary to allow the institute or law

enforcement officials to investigate or respond effectively to the report, or identification is required by law.

Employees may not retaliate against a whistleblower with the intent or effect of adversely affecting the terms or conditions of employment (including, but not limited to threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages). Whistleblowers who believe that they have been retaliated against may file a written complaint with the Executive Director. A proven complaint of retaliation shall result in disciplinary action, up to and including termination of employment. This protection from retaliation is not intended to prohibit managers or supervisors from taking action in the usual scope of their duties.