

# Anti-Harassment Policy

It is the policy of the IMMAP to maintain a working environment that encourages mutual respect, promotes respectful and congenial relationships between employees and that is free from all forms of harassment by anyone, including supervisors, co-workers, vendors, contractors or customers. Harassment, even when not unlawful or directed at a protected category, is expressly prohibited and will not be tolerated by the IMMAP. Accordingly, IMMAP management is committed to vigorously addressing complaints of harassment, sexual harassment and discrimination at all levels within the IMMAP.

Reported or suspected occurrences of harassment or discrimination will be promptly and thoroughly investigated. Following an investigation, the IMMAP will promptly take any necessary and appropriate disciplinary action.

The IMMAP will not permit or condone any acts of retaliation against anyone who files harassment or discrimination complaints or cooperates in the investigation of same.

1. The term "harassment" includes harassment based on any category protected by federal, state, or local law, which may include depending on the jurisdiction, but is not limited to, unwelcome slurs, jokes, or verbal, graphic or physical conduct relating to an individual's race, color, religious creed, sex, national origin, ancestry, citizenship status, pregnancy, childbirth, physical disability, mental disability, age, military status or status as a Vietnam-era or special disabled veteran, marital status, registered domestic partner or civil union status, gender (including sex stereotyping and gender identity or expression), medical condition (including, but not limited to, cancer related or HIV/AIDS related), genetic information or sexual orientation.
2. Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature where:
  - a. Submission to such conduct is an explicit or implicit term or condition of employment;
  - b. Employment decisions are based on an employee's submission to or rejection of such conduct; or,
  - c. Such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

## Complaint Procedure

The IMMAP provides its employees with a convenient and reliable method for reporting incidents of alleged harassment, including sexual harassment and discrimination. Any employee who feels harassed or discriminated against is encouraged to immediately inform the alleged harasser that the behavior is unwelcome. In many instances, the person is unaware that his or her conduct is offensive and when so advised can easily and willingly correct the conduct so that it does not reoccur. If the informal discussion with the alleged harasser is unsuccessful in remedying the problem or if you do not feel comfortable with such an approach, you should immediately report the conduct to your immediate supervisor, or IMMAP's CEO or COO. We cannot help resolve a harassment or discrimination problem unless we know about it. Therefore, it is your responsibility to bring those kinds of problems to our attention so that we can take the

necessary steps to correct the problem. The report should include all facts available to the employee regarding the alleged harassment or sexual harassment or discrimination.

If you wish to make an anonymous complaint, you may do so, but the scope of our investigation may be limited based on the information you provide.

### **Confidentiality**

All reports of alleged harassment, sexual harassment or discrimination will be treated seriously. It will be kept confidential, and it will be shared only with those who have a need to know about it. Depending on the circumstances, that could include the alleged harasser. However, absolute confidentiality is not promised nor can it be assured.

### **Investigative Procedure**

Once a complaint of alleged harassment or sexual harassment or discrimination is received, the IMMAP will begin a prompt and thorough investigation. The investigation may include interviews with all involved employees, including the alleged harasser, and any employees who are aware of facts or incidents alleged to have occurred.

Following an investigation, the IMMAP will promptly take any necessary and appropriate disciplinary action. Disciplinary action will be taken if the investigation reveals that an employee has acted in a manner that is not in alignment with the goal of this policy, even when the actions may be lawful. In fact, the IMMAP may address any workplace issue discovered during an investigation. This may include some or all of the following steps:

1. Restore any lost terms, conditions or benefits of employment to the complaining employee.
2. Discipline the alleged harasser. This discipline can include written disciplinary warnings, transfer, demotion, suspension, and termination.

If the alleged harassment or sexual harassment is from a vendor, contractor or customer, the IMMAP will take appropriate action to stop the conduct.

If you have made a complaint but feel that the action taken in response has not remedied the situation, you should make a complaint following the complaint procedure outlined in this policy.

### **Duties of Employees and Supervisors**

All employees of the IMMAP, both management and non-management, are responsible for assuring that a workplace free of harassment or sexual harassment and discrimination is maintained. Any employee may file a complaint regarding incidents experienced personally or incidents observed in the workplace. The IMMAP strives to maintain a lawful, pleasant work environment where all employees are able to effectively perform their work without interference of any type and requests the assistance of all employees in this effort.

All IMMAP supervisors and managers are expected to adhere to the IMMAP's anti-harassment policy. Supervisors' evaluations may include an assessment of a supervisor's efforts in following and enforcing this policy.

All managers and supervisors are responsible for doing all they can to prevent and discourage harassment, sexual harassment and discrimination from occurring. If a complaint of harassment or sexual harassment or discrimination is raised, the individual to whom the complaint is made (i.e., supervisor, manager, owner of Client IMMAPP) should act promptly to IMMAPP CEO or COO of the complaint so that Human Resources may proceed with an investigation. If such individual fails to follow this policy, he or she will be disciplined. Such discipline may include termination.