



Sexual Harassment Policy

Each employee is responsible for maintaining an atmosphere free of discrimination and harassment, sexual or otherwise. VIA LINK does not condone, tolerate, or excuse harassment of any kind. Instead, the Agency strictly prohibits any form of employee harassment based on gender, religion, creed, mental or physical impairment, age, race, color, national origin, pregnancy, and/or any other legally protected characteristic.

Sexual harassment may include a broad range of subtle or not so subtle behaviors and may involve individuals of the same or different genders. Depending on the circumstances, these behaviors may include, but are not limited to:

- (1) Unwelcome sexual advances or unwanted sexual conduct; requests for sexual favors; and all other verbal or physical conduct of a sexual nature or otherwise offensive nature, especially where:
 - (a) submission to such conduct is made, either explicitly or implicitly, a term or condition of employment;
 - (b) submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment; or
 - (c) such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment.
- (2) Offensive comments, pictures, electronic mail, jokes, innuendos, and other sexually oriented statements.

The Agency prohibits any form of retaliation against any employee for making a bona fide complaint under this policy or for assisting in a complaint investigation. Any employee found to be in violation of this policy is subject to disciplinary action up to and including termination.

VIA LINK requires the prompt reporting of all incidents of harassment or retaliation, regardless of the offender's identity or position. (Of course, you are encouraged first to communicate to the offender that the conduct or statements are inappropriate and unwelcome.) If you are the object of harassment or retaliation, you must report it to your Department Head or directly to the CEO. If you become aware of harassment or retaliation, whether by witnessing/overhearing an incident or being told of it, you must also report the incident to your Department Head or directly to the CEO. **Please do not assume that Agency management is already aware of any particular**

situation. If the alleged harasser is the CEO, then report the harassment to your Department Head or to the HR Manager, who will, in turn, report your complaint to the President or another officer of VIA LINK's Board of Directors.

All harassment and retaliation complaints will be investigated, and confidentiality will be maintained to the fullest extent possible. Appropriate counseling or disciplinary action, up to and including termination, will be taken at the conclusion of the investigation for anyone who has violated this policy.

This policy covers not only employees but situations involving outside vendors, consultants, clients, volunteers, members of the VIA LINK Board of Directors, or the like. If any person outside the Agency is engaging in inappropriate conduct, you are directed to use the complaint procedure discussed above.