Equalize Health does not, under any circumstances, condone or tolerate conduct that may constitute harassment or discrimination on the part of any of its employees. Equalize Health recognizes the rights of all employees to work in an environment free from discrimination, harassment, and retaliation on the basis of race, sex, sexual orientation, gender identity, religion, national origin, age, or physical ability. Any employee found to have engaged in such conduct will be subject to immediate discipline, up to and including termination.

Policy and Definition
No permanent or contracted employee of Equalize Health may engage in verbal, non-verbal, or physical conduct that harasses or discriminates against another employee, client, or partner. Conduct is considered harassing or discriminatory when it has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment on the basis of race, sex (including conditions related to pregnancy, childbirth, and breastfeeding), sexual orientation, gender identity (including transgender and gender non-conforming status), religion, national origin, age, or physical ability. Harassing or discriminatory conduct may include, but is not limited to:

- Physical conduct: Threatening, intimidating, and sexually suggestive acts or gestures, unwelcome physical contact, and forced or coerced groping or kissing;

- Non-verbal conduct: Display or distribution of materials, including photographs, literature, or cartoons, which are hostile or degrading, catcalling / whistling, and purposefully and unnecessarily invading a person's personal space; and

- Verbal conduct: Unwelcome sexual advances, comments about a person's body, requests for sexual favors, slurs, and jokes or comments that are humiliating, alienating, or based on stereotypes.

Sexual harassment is a form of sex discrimination. Sexual harassment is unwelcome physical, verbal, or non-verbal conduct of a sexual nature where:

- Submission to such conduct is made, either explicitly or implicitly, a term or condition of instruction, employment, or participation in other Equalize Health activities;

- Submission to, or rejection of, such conduct by an individual is used as a basis for an employment decision; or

- Such conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive company environment.
Equalize Health takes harassment and discrimination allegations seriously. In determining whether an alleged behavior constitutes harassment, the full context in which the incident occurred shall be considered.

**Guidelines**

Don’t let it slide – if you believe you have been harassed, immediately report the matter to your manager and/or HR. Harassment and discrimination are never acceptable, and we want to make sure we can resolve the problem so that it will never happen again. It is a violation of Equalize Health’s policy to fail to investigate complaints of harassment, or to fail to take timely corrective action in the event misconduct has occurred.

Filing a complaint or otherwise reporting harassment shall not cause any reflection on the individual’s status as an employee, nor shall it affect future employment, compensation, work assignment, or evaluation of the individual. Retaliation against a person for filing a harassment complaint is grounds for a subsequent harassment complaint. Likewise, the person accused of harassment is entitled to the same protection until such a time as the charges may be substantiated by an investigation.

A false allegation of harassment is a violation of this policy and is itself subject to the procedures and sanctions following. To constitute such a violation, however, the complaint would ordinarily need to be false as to a specific allegation of fact. That an investigating party or committee should, while agreeing on factual matters alleged, nevertheless differ in judgment or interpretation of the incident and conclude that it did not constitute harassment, would not make the complaint a violation apart from evidence of conscious and willful intent to distort or exaggerate the allegation and damage the accused party.

The rights of confidentiality of all parties involved in a harassment charge shall be strictly observed.

**Procedure for an Informal Complaint: Consultation**

In most cases, complaints of harassment can be dealt with informally. In the case of complaints made by or against members of the classified staff, the director of personnel services will work with the responsible Director, Supervisor, or Manager (will be referred to as the Management Team throughout this document) in seeking resolution of the complaint.

The Management Team will evaluate the validity of the complaint and the degree of seriousness of the offense and seek, to the extent possible and appropriate, to resolve the matter. An informal resolution might take the form of clarifying to the offending party the kind of behavior that may be deemed objectionable and ensuring cessation of such behavior; it might also take the form of clarifying to the complaining party that the incident does not constitute harassment.

Careful attention must be given to mitigating or aggravating circumstances.

When valid complaints are resolved informally, the offending party will be cautioned that repetition of such conduct could lead to formal investigation and sanctions.
Although the primary purposes of consultation and informal resolution are to resolve conflicts, heighten awareness, and achieve changes in behavior without resorting to formal investigatory or disciplinary proceedings, nothing in these guidelines should be construed to discourage more formal procedures when the seriousness or repetitive character of the offense makes that the more appropriate course of action, or when the reporting party is not satisfied with the proposed resolution. The Management Team may encourage moving to a formal complaint when, in his or her judgment, the complaint has a sufficient degree of seriousness, or is a repetition of previous complaints, so as to indicate that informal resolution has been inadequate.

**Procedure for a Formal Complaint**

If, following consultation regarding the complaint as specified above, the person alleging harassment or discrimination should wish to make a formal complaint, he or she should submit a written description of the offensive behavior and the circumstances surrounding it to the HR or Operations Department(s).

**Investigation**

In cases of formal complaints against supervisors or contract employees, the HR or Operations Department(s) will request that an ad hoc committee composed of three members be appointed to investigate the allegations and to recommend sanctions, if any.

For allegations against supervisors, the three members of the committee will be composed of at least one Board Member, one HR team member, and one Executive Management member who does not directly report to or work with the accused supervisor. For allegations against contract employees, the committee will be composed of one HR team member, one Executive Management member, and one Supervisory member with direct administrative responsibility for the accused contract employee.

For allegations against employees, the investigation and determination of sanctions will be handled under the existing policies stated in the Employee Handbook and procedures of the human resources office. The committee will be composed of one HR team member, one Executive Management member, and one Supervisory member with direct administrative responsibility for the accused employee.

For allegations against managing employees, the three members of the committee will be composed of at least one Board Member, one HR team member, and one Executive Management member who does not directly report to or work with the accused manager. Members of the committee should meet to discuss the complaint. The parties to the dispute should be invited to appear before the committee and confront any adverse witnesses. The committee will conduct its own informal inquiry, call witnesses, and gather whatever information it deems necessary to assist it in reaching a determination as to the merits of the allegations. Once such a determination has been reached, it should be communicated in writing to both parties, along with a summary of the basis for the determination.
Sanctions
If a sanction is recommended against a supervisor, contract or managing employee, the committee report and the recommendation for sanction will be sent to the appropriate vice president and the personnel director. As in the procedures of consultation, the seriousness of the offense, the context in which the incident occurred, any mitigating or aggravating circumstances, and any history of past offenses of a related nature must be carefully considered in reaching an equitable recommendation.

Allegations Against Supervisors:
Sanctions may be taken up to and including termination of employment in accordance with Equalize Health policy. Principles governing the imposition and appeal of minor and major sanctions are stipulated in the policy statements on responsibility, tenure, and due process.

Allegations Against Contract Employees:
Sanctions may be taken up to and including termination of employment. If the individual wishes to appeal a sanction, the appeal should be directed to the CEO of the Company.

Allegations Against Employees:
Sanctions may be taken up to and including termination from employment in accordance with policies stated in the Employee Handbook. If the person to whom the sanction is applied wishes to appeal the decision, he or she may do so in accordance with the procedures outlined in the handbook.

Allegations Against Managing Employees:
Sanctions may be taken up to and including termination of employment from Equalize Health in accordance with the Manager’s Handbook. If the person to whom the sanction is applied wishes to appeal the decision, he or she may do so in accordance with the grievance and appeal procedures of the handbook.

Sexist Language
It is not the intent of this policy to regard harassment as most of what ordinarily is meant by the term sexist language. Although it is not recommended language, the foregoing definitions, procedures, and sanctions do not apply to an individual’s personal choice among conventions of language that fall within the broad and changing range of common English usage, for example, the generic use of "man," "mankind," or masculine pronouns.

Resolution Concerning Nonsexist Language
As part of Equalize Health’s ongoing commitment to speaking and writing effectively and of our general goal of promoting social equality, members of the Equalize Health community should avoid linguistic practices that may be construed as undermining equality.
I ACKNOWLEDGE THAT I HAVE READ, UNDERSTAND, AND WILL COMPLY WITH THIS POLICY.

Employee Signature

Date

Print Name