

**Policy: 110.0 12.27.16 Anti-Harassment Policy**

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Human Resources  
Policies and ProceduresApproved: *Liz Murphy***Overview & Purpose**

It is the objective of CampusWorks, Inc., (CampusWorks) to provide a work environment free from elements that would deter employees from performing their best work. CampusWorks complies with applicable state and local laws governing nondiscrimination in employment in every location in which the company operates.

**Policy:**

CampusWorks expressly prohibits any form of unlawful employee discrimination or harassment based on race, color, religion, gender, sexual orientation, national origin, age, genetic information, disability, or veteran status. Improper interference with the ability of CampusWorks employees to perform their expected job duties is absolutely not tolerated.

**Procedures:**

CampusWorks is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, CampusWorks expects that all relationships among persons in an office or virtual setting will be business-like and free of bias, prejudice and harassment.

CampusWorks encourages reporting of all perceived incidents of discrimination or harassment. All incidents reported will be promptly and thoroughly investigated. CampusWorks prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

***Definitions of Harassment***

*Sexual Harassment* constitutes discrimination and is illegal under federal, state and local laws. For the purposes of 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 a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or c) 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.

*Discriminatory Harassment* on the basis of any other protected characteristic 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 his/her race, color, religion, gender,

sexual orientation, national origin, age, disability, marital status, citizenship, genetic information or any other characteristic protected by law or that of his/her relatives, friends or associates, and that a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; b) has the purpose or effect of unreasonably interfering with an individual's work performance; or c) otherwise adversely affects an individual's employment opportunities.

### ***Individuals and Conduct Covered***

These policies apply to all applicants and employees, whether related to conduct engaged in by fellow employees or someone not directly connected to CampusWorks (e.g., an outside vendor, consultant or client).

Conduct prohibited by these policies is unacceptable in the workplace or virtual setting and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

### ***Complaint Process***

Individuals who believe they have been the victims of conduct prohibited by this policy statement or who believe they have witnessed such conduct should discuss their concerns with their immediate supervisor, the Senior Director Talent & Human Resources or any member of management.

When possible, CampusWorks encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. CampusWorks recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

CampusWorks encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained.

Managers or leaders must deal expeditiously and fairly with allegations of sexual harassment within their practices whether or not there has been a written or formal complaint. They must:

- Take all complaints or concerns of alleged or possible harassment or discrimination seriously no matter how minor or who is involved.
- Ensure that harassment or inappropriate sexually oriented conduct is immediately reported to HR so that a prompt investigation can occur.
- Take any appropriate action to prevent retaliation or prohibited conduct from recurring during and after any investigations or complaints.

Managers or leaders who knowingly allow or tolerate sexual harassment or retaliation, including the failure to immediately report such misconduct to the Senior Director Talent & Human Resources, are in violation of this policy and subject to discipline up to and including termination.

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.

Confidentiality will be maintained 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 and, like harassment or discrimination itself, will be subject to disciplinary action. 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, which may include discipline up to and including termination of employment.

If a party to a complaint does not agree with its resolution, that party may appeal to CampusWorks' Senior Director Talent & Human Resources or the CEO.

CampusWorks is committed to maintaining an environment free from harassment. However, any investigation that is conducted as a result of a complaint of harassment, discrimination or retaliation that results in a determination that the complaint was intentionally false or malicious may be the subject of appropriate disciplinary action up to and including termination of employment.