

Policy Title	Anti-Harassment Policy
Effective Date	November 21, 2018
Revision Date	
Approved By	Compliance Team
Related Entities	Friends House Retirement Community, Inc.

The company is committed to maintaining a work environment that is free from unlawful harassment. In keeping with this commitment, the company will not tolerate harassment of any of its employees by anyone, including any manager, supervisor, co-worker, vendor, resident, client, family member or customer.

Unlawful Harassment Defined

Unlawful harassment includes unwelcome conduct directed at or committed by any employee on the basis of race, sex, color, religion, national origin, age, pregnancy-related disability, physical or mental disability, genetic information, sexual orientation, marital status, creed, citizenship, veteran or military status, parental leave status, or any other characteristic protected by federal, state, or local law, and may consist of, but is not limited to, slurs, jokes, offensive comments, or other unwelcome verbal, written, or electronic communications (including any form of communication made through social media), physical conduct, aggression, intimidation, or graphic depictions. This policy applies whether the harassing conduct occurs in the workplace, while conducting company business out of the workplace, such as business related travel or employer sponsored social functions/parties, and/or through the use of any of company property or systems such as computers, telephones, cell/smart phones, fax machines, mail, email, or by any other means, including, but not limited to, including any form of communication made through social media. Please note that Friends House reserves the right to monitor workplace internet use and email done on any company owned devices.

Harassment becomes unlawful where (1) enduring the offensive conduct becomes a condition of continued employment, or (2) the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive. This policy not only prohibits unlawful harassment but harassing conduct that – if allowed to continue – could rise to the level of unlawful harassment.

Warning: It is not a defense for a person accused of harassment to say that he or she didn't think their conduct was unwelcome or that they were just "kidding around." The best and possibly the only way to ensure that you are never accused of harassment is to avoid any type of behavior that could be considered harassing!

Sexual Harassment Defined.

Sexual harassment deserves special mention. Sexually harassing conduct may be found where (1) submission to the conduct is an explicit or implicit term or condition of employment, (2) submission to or rejection of the conduct influences an employment decision, or (3) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive workplace.

The company's policy prohibits the harassing conduct identified above on the basis of sex, sexual orientation, gender or gender identity, as well as conduct that includes, but is not limited to:

- Unwelcome advances, propositions, or requests for sexual favors
- Verbal abuse of a sexual nature including sexual advances or propositions
- Offensive sexual flirtation, explicit or degrading verbal comments about another individual or his or her body
- Display of sexually suggestive pictures or objects
- Any offensive, intimidating or abusive physical conduct
- Making or threatening reprisals after a negative response to sexual advances
- Sexually explicit language, jokes and the like
- Unwelcome touching or other physical contact or actions that impede or block another's movement
- Offering employment benefits in exchange for sexual favors
- Making derogatory statements about one's sexual orientation

Reporting Procedure and Investigation.

Please notify your manager and/or the Director of Human Resources, Elizabeth Nicely immediately if you feel that you have been subjected to, learned about, or witnessed any conduct prohibited by this policy or discriminatory conduct prohibited by the company's Equal Employment Opportunity policy (or other nondiscrimination policies), or any conduct that – if allowed to continue – could rise to the level of harassment or discrimination, so that the company may take action to address and correct the situation. When possible, a complaint should include details of the incident or incidents, names of individuals involved, and names of any witnesses. Complaints may be made orally or in writing.

Complaints will be promptly and thoroughly investigated. The identity of an individual who submits a report, a witness who provides information regarding a report, and the target of the complaint, and any information gathered as part of the investigation, will be kept confidential to the extent possible by law but complete confidentiality cannot be guaranteed, consistent with a thorough and impartial

investigation. Employees are required to cooperate fully with all internal investigations and provide truthful information.

Any supervisor or manager who receives a complaint of discrimination, harassment, or retaliation, or who learns about any conduct that potentially violates this policy, is required to promptly forward that information to Director of Human Resources, Elizabeth Nicely (ideally within 24 hours), and will be subject to disciplinary action, up to and including termination, for failing to timely report.

No Retaliation.

Retaliation against any employee who makes a complaint in good faith or participates in an investigation into complaints about unlawful discrimination or harassment is strictly prohibited and is itself a violation of this policy. Any employee who feels that he or she has been subjected to retaliation for reporting a complaint or participating in an investigation of unlawful harassment or discrimination under this policy should inform the Director of Human Resources, Elizabeth Nicely immediately.

Violation

The company will take immediate and appropriate corrective action if it determines that harassment, discrimination, or retaliation has occurred. Violations of this policy may result in disciplinary action up to and including termination of employment.

If you have any questions about this policy, please contact Director of Human Resources, Elizabeth Nicely via email: enicely@friendshouse.com or 301-924-7535.