



Title: ANTI-HARASSMENT POLICY

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This policy is an initial release.

Prospanica is committed to providing an environment that is free of harassment. To be successful in this objective, it is incumbent upon all employees and directors not to condone or tolerate behavior that constitutes harassments. This policy covers complaints of harassment, including sexual harassment, as defined below.

DEFINITIONS

Sexual Harassment

Sexual harassment means any unwelcome conduct, comment, gesture or contact based on someone's sex or gender. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender) as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature, whether on a one-time basis or in a continuous series of incidents that:

- Might reasonably be expected to cause offense, embarrassment or humiliation.
- Might reasonably be expected to be perceived as placing a condition of a sexual nature on employment, services, or on any opportunity for training and advancement.
- Such conduct has the purpose or effect of unreasonably interfering with the work environment or creating an intimidating, hostile or offensive work environment.

Sexual harassment can be subtle or direct. It usually involves different genders, but may be committed by someone of the same gender. Sexually harassing behavior may include intentional physical conduct that is sexual in nature, sexual jokes and innuendos, sexual advances or requests for sexual favors, propositions, verbal abuse of a sexual nature, commentary about an individual's body, sexual prowess or sexual deficiencies, leering, touching, sexually based obscene comments or gestures, display of sexually suggestive objects or pictures and any other type of physical, verbal or visual conduct of a sexual nature.

Sexual harassment may occur through various methods including personal contact, in writing, over the telephone, through e-mail and on the Intranet or Internet. The means by which sexually harassing behavior is conducted do not change its inappropriateness.



Physical Conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of organization-related threats or rewards to solicit sexual favors

Verbal Conduct

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy insults based on the sex of the worker
- Condescending or paternalistic remarks

Harassment

Under this policy, harassment is defined as any unwelcome or objectionable, physical, visual or verbal conduct, comment or display, whether intended or unintended, that is insulting, humiliating or degrading to another person, or create an intimidating, hostile or offensive environment and/or is on the basis of race, ethnicity, language, financial ability, religion, gender, sexual orientation, sex (including pregnancy), disability, age, citizenship, genetic information, past, current or prospective service in the uniformed services, or any other kind of discrimination which is prohibited under local, state or federal law.

Examples of harassment include, but are not limited to:

- Threats made or perceived, that are malicious, vexatious or based on any of the prohibited grounds under Human Rights legislation
- Derogatory written or verbal communication or gestures
- Making offensive reference to an individual's mental or physical disability
- Using racist slang, phrases, or nicknames
- Offensively talking about negative racial, ethnic, or religious stereotypes
- Sharing inappropriate images, videos, e-mails, letters, or notes in an offensive nature
- Making offensive gestures

The above examples are illustrative only, and not exhaustive. No form of harassment will be tolerated.

Bullying

Bullying is an offensive, cruel, intimidating, insulting or humiliating behavior which includes physical violence or the threat of physical violence. It can be physical or verbal, direct or indirect such as gossip. Bullying is considered harassment in general, unless there is physical contact



or a threat of violence, where it is considered violence. Bullying is ill treatment which is not addressed under human rights legislation or criminal codes.

Abuse of Power

Abuse of power happens whenever an employee or director abuses or misuses his/her power and discretion for personal benefit, or in benefit of another person. Abuse of power, for the purposes of this policy, includes situations involving a minor, situations that involve a reporting relationship, or any situation that includes an accusation from a customer/member against an employee or director who is providing a service upon which the customer/member depends. Incidents that involved an abuse of power are considered as being, generally, of a more serious nature than peer-to-peer situations.

Workplace

For the purposes of this policy, workplace includes any location in which employees and/or directors are engaged in Prospanica business activities necessary to perform their assignments. This includes, but is not limited to, Prospanica national office, employee/director organized social events/meetings, customer visits, and during business related travel.

Employee and Director Responsibilities / Complaint Procedure

All employees and directors are responsible for contributing to a positive work environment and for identifying and discouraging comments or activities that are contrary to this policy. This includes advising people or the alleged harasser that his/her behavior is unwelcome. Where a situation occurs, or where an employee or director believes a situation has occurred, he/she is obligated to report it to their supervisor/manager, chapter relations department or Prospanica management. If a situation occurs which involves their supervisor/manager, or if their supervisor/manager does not intervene appropriately, the employee/director may report the situation to the CEO of Prospanica or via the Whistle Blower service provider.

Confidentiality

Complaints of harassment will be received and investigated in a confidential manner in accordance with the procedures, including prescribing corrective action. Information that must be shared will be disclosed on a need-to-know basis.

Disciplinary Action and No Retaliation

Harassment of any kind by an employee or director is a serious offense. Prospanica will operate a zero tolerance policy for any form of harassment in the organization, treat all incidents seriously and promptly investigate all allegations of harassment. If an accusation is substantiated, the harasser will be subject to immediate disciplinary action, up to and including dismissal, removal from director position and membership revoked. Intentionally accusing someone of harassment, known to be false, is a serious offence and is subject to disciplinary action. All complaints of harassment will be taken seriously and treated with respect and in confidence. No one will be subject to, and Prospanica prohibits, any form of discipline, reprisal,



intimidation or retaliation for good faith reporting of incidents of harassment of any kind, pursuing any harassment claim or cooperating in related investigations.

Responsibility

Prospanica CEO and National Board of Directors are responsible for maintaining, monitoring, and revising this policy. Prospanica management and Chapter leaders (directors) are responsible for applying and implementing this policy in each of their respective areas.

When individuals bring awareness and are mindful of their words and actions, they can help cultivate an ethical climate of understanding and compassion where employees and directors feel safe to work in harmony, free of discrimination and harassment.