



**making headway**  
**foundation**

## **POLICY AGAINST DISCRIMINATION AND SEXUAL HARRASSMENT**

### ***Anti-Discrimination Policy***

Making Headway Foundation (the “Foundation”) shall not discriminate because of race, color, age, sex, marital status, disability, national origin or ancestry, religion, economic status, union membership, or political affiliation. This covers all areas of employment, recruitment, advertising, hiring, promotion, demotion, lateral reassignment, transfer, layoff, discharge, rates of pay or other compensation, training, or any other benefits. Employment will be solely on the basis of merit and qualification.

The Foundation shall comply with the intent of the Americans with Disabilities Act of 1990 and shall not knowingly discriminate against individuals with disabilities. The Foundation will consider modifying schedules and other adjustments to reasonably accommodate employees with disabilities.

Any grievance regarding discrimination shall be handled through the Equal Employment Opportunity Commission officer (the chief executive or designee) of The Foundation and in consultation with the Personnel Committee when appropriate. The complainant should contact the EEOC officer (the chief executive or, if the complaint is against the chief executive, the chair of the personnel committee), who shall provide information and assistance on filing and pursuing the complaint.

### ***Sexual Harassment Policy***

The Foundation prohibits any employee, volunteer, or vendor from making sexual advances of a verbal or physical nature toward another employee or applicant for employment.

Sexual harassment is viewed as a form of employee conduct that undermines the integrity of the employment relationship. All employees must be allowed to work in an environment free from unsolicited and unwelcome sexual overtures. Sexual harassment is defined as behavior that is unwelcome and personally offensive. It reduces morale, interferes with work productivity, impugns individual dignity, and is contrary to the Foundation’s mission.

Some examples of sexual harassment are:

- Unwelcome or unwanted sexual advances. This includes patting, pinching, brushing up against, hugging, cornering, kissing, fondling, or any other similar physical contact considered unacceptable by another individual.
- Requests or demands for sexual favors. This includes subtle or blatant expectations, pressures, or requests for any type of sexual favor accompanied by an implied or stated promise of preferential treatment or negative consequences concerning one's employment.
- Verbal abuse or kidding that is sexually oriented and considered unacceptable by another individual. This includes comments about an individual's body or appearance (where such comments go beyond a mere compliment); off-color jokes that are clearly unwanted; or any other tasteless, sexually-oriented comments, innuendoes, or offensive language.
- Any sexually oriented conduct that would unreasonably interfere with another's work performance. This includes extending unwanted sexual attention to someone, which reduces personal productivity.
- Participation in fostering a work environment that is generally intimidating, hostile, or offensive because of unwelcome or unwanted sexually oriented conversation, suggestions, requests, demands, physical contacts, or attention.

Sexual harassment is a practice that demeans the individual being treated in such a manner. Consequently, the Foundation will not tolerate sexual harassment of its applicants, employees, or volunteers by anyone. The Foundation will, as necessary, take disciplinary action, up to and including termination, in accordance with this policy to ensure that we meet our responsibilities to our employees.

The responsibility of the Foundation's sexual harassment policy execution and administration is assigned to the director of human resources. Each employee of the Foundation is accountable for acting in compliance with and support of the policy. Every employee is encouraged to discuss any violations of this policy in confidentiality with the Director of Human Resources [or the Chairman of the Board] without fear of any reprisals. Employees may also bring such violations to the attention of their immediate supervisor.