

WORKPLACE HARASSMENT POLICY
Adopted June 20, 2020

1. Policy Statement

Island Housing Trust (“IHT”) is committed to providing a work environment that is free of unlawful discrimination. In keeping with this objective, IHT maintains a strict policy against harassment based on any of the following categories: race, color, religion, national origin, ancestry, sex, gender identity, age, handicap (disability), participation in discrimination complaint-related activities, sexual orientation, genetics, pregnancy, active military or veteran status or any other protected category.

2. Sexual Harassment

In Massachusetts, "sexual harassment" means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or,
- such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a work place environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

3. Other Prohibited Harassment

In addition to sexual harassment, IHT also prohibits all forms of harassment on any basis prohibited by discrimination laws, such as race, color, religion, national origin, ancestry, sex, gender identity, age, handicap (disability), participation in discrimination complaint-related activities, sexual orientation, genetics, pregnancy, active military or veteran status.

4. Examples of Prohibited Behavior

While it is not easy to define precisely what harassment is, it certainly includes slurs, epithets, threats, derogatory comments, unwelcome jokes, teasing, and other similar verbal, written, or physical conduct such as:

- using remarks or actions of a sexual nature that are not welcome and are likely to be viewed as personally offensive, including sexual flirtations;
- unwelcome physical advances. This includes patting, pinching, brushing up against, hugging, cornering, kissing, fondling, or any other similar physical contact considered unacceptable by another individual;
- unwelcome verbal advances, sexual propositions, or 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, stereotyping, or offensive language directed to or about another individual because of his or her gender, gender identity or gender orientation;
- the display of sexually suggestive objects, cartoons, or pictures;
- using epithets, slurs, negative stereotyping, and threatening, intimidating, or hostile acts that relate to race, color, religion, gender, national origin, gender identity or orientation, age, or disability or other protected status;
- circulating or posting written or graphic material in the workplace that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, gender identity or orientation, nationality, age, disability or other protected status; or
- 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.

5. Reporting Concerns

Any employee who believes he or she has been or is being harassed by a coworker, supervisor, director, volunteer or contractor of IHT and anyone who has witnessed such conduct, should immediately report the facts of the incident(s) and names of the individuals involved to his or her supervisor or, in the alternative, to the Executive Director or the Board President. The Executive Director will inform the Board President promptly of any such report. IHT's Whistleblower Policy applies to concerns reported under this Workplace Harassment Policy.

6. Investigation

The Executive Committee of the Board will determine promptly which person(s) shall be appointed to investigate concerns reported under this Policy. Violation of this policy will be subject to discipline that may range from a warning up to, and including, termination of employment or other relationship with IHT. IHT will maintain the confidentiality of the complainant, the accused, and the witnesses to the extent possible under the circumstances. IHT cannot promise absolute confidentiality, but pledges to



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conduct the investigation on a need-to-know basis. Only those who must know about the complaint and the identity of the complainant will be made aware of and have access to that information.

7. Other Remedies

In addition to the above, if an employee believes that he or she has been subjected to sexual harassment, the employee may file a formal complaint with either or both of the government agencies set forth below. Using IHT's complaint process does not prohibit an employee from filing a complaint with the U.S. Equal Employment Opportunity Commission or the Massachusetts Commission Against Discrimination.