

# Sexual and Other Unlawful Harassment Prevention Policy

Sexual harassment is illegal and contrary to the policy of PA-TED SPRING COMPANY LLC. Consistent with the guideline on sex discrimination issued by the Equal Employment Commission and the Connecticut Commission on Human Rights and Opportunities (CHRO), PA-TED endorses the following statement of policy:

It is the policy of PA-TED to foster a work environment free of sexual discrimination, intimidation and insult. PA-TED **PROHIBITS** any employee, male/female/non-binary, from making unwelcome and unsolicited sexual advances, requests for sexual favors or engaging in other or physical conduct of a sexual nature, when (a) submission to or rejection of such advances, requests or conduct is made explicitly or implicitly a term or condition of an employee's employment, or (b) submission to or rejection of such advances, requests or conduct is used as a basis for employment decisions affecting the employee, and (c) such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile or offensive working environment.

## **Sexual harassment may include, but is not limited to:**

- Offensive remarks or gestures of a sexual or suggestive nature
- Unwelcome physical contact
- Pressure or demands for sexual favors when accompanied by implied or overt threats concerning individual's employment status or by implied or overt promises of preferential treatment in employment matters.

## **Sexually harassing or offensive conduct in the workplace, committed by an employee, is prohibited. Such conduct includes, but is not limited to:**

- Sexually degrading words to describe an individual
- Graphic or suggestive comments about an individual's dress or body
- Verbal abuse of a sexual nature
- Sexual flirtation, touching, advances
- The display of sexually suggestive objects or pictures, including nude photographs.

PA-TED prohibits taking any retaliatory action for reporting or inquiring about alleged improper or harassing behavior. All employees should take special note that retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by the Company.

Please note that while this policy sets forth PA-TED goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

## **Complaint Process**

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(a) Any employee who believes that he or she has been the victim of sexual harassment should report the alleged act immediately by bringing the matter to the attention of anyone who is in a supervisory or management position that you feel comfortable talking to.

(b) It is then the responsibility of the higher management to conduct a prompt and thorough investigation of all the circumstances surrounding the alleged incident of sexual harassment. If the investigation discloses that an employee has committed an act of sexual harassment, the employee shall be subject to appropriate disciplinary action, up to and including termination.

## Management Responsibility:

- a) Supervisors are responsible for creating and maintaining a positive and productive work environment. Supervisors are required to:
  - Report all incidents to upper management and Human Resources immediately.
  - Take all steps possible to eliminate any harassment they become aware of.
  - Bring this policy to the attention of their subordinate supervisors and employees.
  - Initiate disciplinary action whenever it appears a violation of this policy may have occurred.
- b) PA-TED recognizes that some incidents may constitute purely personal or social conduct and may be neither discriminatory nor related in any way to employment. Distinguishing these personal non-employment related incidents from genuine sexual harassment may be a difficult task, which can be accomplished only after thorough factual investigation.
- c) Given the nature of this type of discrimination, PA-TED recognizes also that false accusations of sexual harassment can be made, can be difficult to refute, and can have serious effects on innocent individuals. Any employee who knowingly makes a false accusation of sexual harassment is also subject to disciplinary action, up to and including termination. We expect that all employees will act responsibly to establish a pleasant working environment free from discrimination.
- d) All current employees have been provided two hours of training and education in sexual harassment. All new employees must receive this training within six months of hiring.
- e) This training includes information concerning sexual harassment and remedies available to victims of sexual harassment and conforms to the training requirements outlined in the regulations adopted by the Connecticut Commission on Human Rights and Opportunities.
- f) Any employee who believes that the action(s) of a fellow employee constitute unwelcome harassment has a responsibility to report, as soon as possible, to any supervisor.
- g) Complaints of harassment must be investigated promptly and in as impartial and confidential a manner as possible. If any employee is not satisfied with the handling of a complaint or the action taken, then the employee should bring the complaint to the attention of the President.

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- h) In all cases, the employee is to be advised of the investigator's or the President's findings and conclusions.
- i) Any employee, supervisor, or manager if found, after appropriate investigation, to have engaged in harassment of another employee will be subject to appropriate disciplinary action, depending on the circumstances, up to and including termination.
- j) Any employee who, after an appropriate investigation has been made, is found to have knowingly made a false accusation of sexual harassment will be subject to termination.
- k) Retaliation against any employee who makes a complaint in good faith or co-operates with an investigation is prohibited. Any employee found to have retaliated will be subject to disciplinary action, up to including termination.