



## **NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY**

### **1. PURPOSE**

This Non-Discrimination and Anti-Harassment Policy establishes Women Deliver’s commitment to provide a work environment that is free of discrimination, including freedom from harassment based on race, color, creed, religion, sex, age, ancestry, medical condition, physical or mental disability, pregnancy, ethnicity, national origin, military status, marital status, familial status, sexual orientation, predisposing genetic characteristics, domestic violence victim status, or any other characteristic protected by federal, state, or local law (“Protected Classification”).

### **2. SCOPE**

This Policy applies to all areas of Women Deliver operations including the workplace, work-related functions, or other areas outside of work if related to the workplace. This Policy applies to all employees, consultants, guests, interns, volunteers, vendors and other persons doing business with Women Deliver. All such persons are requested to act responsibly in helping Women Deliver maintain a workplace environment that is free from Discrimination and Harassment.

### **3. POLICY STATEMENT**

Women Deliver is built on teamwork and equal opportunity. Discrimination based on a Protected Classification (“Discrimination”) is strictly prohibited. Discrimination is the adverse treatment of another individual based on a Protected Classification, including retaliation against an individual for filing a complaint of Discrimination, participating in an investigation, or opposing discriminatory practices.

Harassment is a form of conduct that undermines the integrity of the employment environment. Harassment is defined as subjecting an individual to humiliating, offensive, abusive or threatening conduct that creates an intimidating hostile or abusive work environment; alters the conditions of employment; or unreasonably interferes with that individual work performance on the basis of that individual’s Protected Classification. Harassment based on a Protected Classification is strictly prohibited, whether at the workplace or at Women Deliver-sponsored functions, events or programs. Should such Harassment occur, Women Deliver will take appropriate corrective action to prevent its continuation or recurrence. In addition, Women Deliver will endeavor to prevent harassment of its employees by persons who are not employees, but are on Women Deliver premises or have a relationship with Women Deliver.

Any staff member who is determined to have engaged in Discrimination or Harassment will be subject to disciplinary action, up to and including termination of employment.

#### **Definition of Harassment**

Harassment can occur in the following ways:

- **Verbal harassment** (oral, written or e-mail) such as statements, comments, or jokes referring to a certain ethnic group, race, sex, nationality, age, disability, sexual orientation, religion, or belief; epithets; derogatory comments; vulgar or profane words and/or expressions; or slurs.
- **Physical harassment** such as unwelcome touching, assault, blocking, impairing, or otherwise physically interfering with an individual's normal work or movement.
- **Visual harassment** such as derogatory gestures, posters, cartoons, or drawings.
- **Sexual harassment** occurs when one person coerces another to enter into a sexual relationship, or subjects the other person, because of their sex or by employing sexual pressure or coercion, to a hostile work environment. Sexual harassment may involve a range of activities, such as non-verbal behavior, written or oral expression, and physical contact. Prohibited conduct may include, but is not limited to:
  - Unwelcome sexual flirtations, advances, questions or propositions;
  - Requests or demands for sexual favors;
  - Verbal use or epithets of a sexual nature;
  - Graphic or degrading verbal comments or questions about an individual's appearance or their sexual conduct or relationships;
  - Displaying or disseminating sexually suggestive or offensive projects, literature or pictures, including computer images and the sending of offensive or inappropriate emails;
  - Making obscene or rude gestures or noises, including catcalls or whistles, or ogling or leering at someone;
  - Unwanted offensive or abusive physical contact, including pinching, brushing against the body, or blocking someone's movement;
  - Offensive jokes or comments, innuendos, and other sexually oriented statements.

Sexual advances, requests for sexual favors, and other conduct of a sexual nature constitute Sexual Harassment when such proposals are made under circumstances implying that a person's response might result in negative work decisions; such conduct is so aggravated as to contribute to inhospitable work environment, or interfere with required tasks or career opportunities; or such conduct is abusive of others and creates or implies a discriminatory hostility towards their personal or professional interests. Sexual harassment commonly occurs when one person has or exercises authority, supervision or control over another person; however, Sexual Harassment can come from supervisors or co-workers or others who are on the same premises, and from people of the same or different gender. Women Deliver emphasizes that it will not tolerate any form of Sexual Harassment.

#### **4. DISCRIMINATION AND HARASSMENT COMPLAINT PROCEDURES**

Employees are expected to follow the procedures described below in the event that an employee believes they have been the subject of any type of Discrimination or Harassment, including Sexual Harassment, or any other conduct that violates Women Deliver's Non-Discrimination and Harassment Policy.

If an employee believes that they are being harassed, they should:

- Feel free to tell the perpetrator that their actions are not welcome and must stop;
- Immediately report the incident to their supervisor, Chief Operating Officer (COO), any management representative with whom the employee is comfortable and who is not the subject of the complaint, or the Chair of the Board of Directors, as well as the ADP Employee Service Center at 844-448-0324 and [myts@adp.com](mailto:myts@adp.com);
- Employees who become aware of an incident of Discrimination or Harassment, whether by witnessing the incident or being told of it, are obliged to report such incident to their supervisor or any management or board member with whom they are comfortable.

Any additional incidents that occur should be reported as directed above.

### **Resolution of Incidents of Discrimination or Harassment**

All reported incidents of Discrimination or Harassment will be investigated by Women Deliver, in coordination with the ADP Employee Service Center. Complaints and actions taken to resolve complaints will be handled as confidentially as possible under the circumstances, including the identity of the complainant. Certain allegations may be of such a serious nature, individually or cumulatively, that the identity of the complainant cannot be kept confidential.

Depending on the circumstances, an investigation may be conducted by a designee of the President and Chief Executive Officer (CEO), in coordination with ADP. Investigators may include the Senior Advisor, Talent, Organizational Development & Strategy, in-house counsel, or a panel or special committee appointed by the President or Board of Directors. Outside specialists, attorneys, or consultants may also be engaged to conduct or assist with the investigation. As soon as practicable, a report will be prepared stating the results of the investigation, the determination, and recommendations for follow-up, including but not limited to disciplinary actions, further training on this Non-Discrimination and Anti-Harassment Policy, and other appropriate responsive as well as pro-active undertakings.

Women Deliver expects all employees to cooperate fully with an investigation of a Discrimination or Harassment complaint. Cooperation includes maintaining the confidentiality of any information provided or discussed in connection with the investigation.

### **Prohibition Against Retaliation**

Retaliation of any kind against an employee who reports an alleged incident of harassment or misconduct is strictly prohibited. Any employee who violates this policy or retaliates against another employee for such a reason will be subject to disciplinary action up to and including termination.

## **5. RECORDS MANAGEMENT**

Staff must maintain all records relevant to administering this policy and procedure in accordance with Women Deliver's record-keeping system.

## **6. RELATED LEGISLATION AND DOCUMENTS**

- Title VII of the Civil Rights Act of 1964 (Title VII), 42 USC sec. 2000e et seq.
- Civil Rights Act of 1991, 42 USC sec. 1981 et seq.
- Age Discrimination in Employment Act (ADEA), 29 USC sec. 691 et seq.
- Title VI of the Americans with Disabilities Act (ADA), 42 USC sec. 1211 et seq.

- New York Human Rights Law § 296.1 (codified as N.Y. Executive Law, Art. 15 section 296)

## 7. APPROVAL AND REVIEW DETAILS

Approval and Amendment History	Details
Original Approval Authority and Date	Board of Directors, December 28, 2017
Amendment, Amendment Authority and Date	
Notes	This document replaces and supersedes any previous Non-Discrimination and/or Anti-Harassment Policy.