
NON-DISCRIMINATION AND ANTI-HARASSMENT

Scope: This policy applies to all employees of the Organization and prohibits harassment, bullying, discrimination and retaliation whether engaged in by fellow employees, by a supervisor or manager or by someone not directly connected to the Organization (e.g., an outside vendor, consultant, etc.)

PURPOSE

The Organization is committed to a work environment in which all individuals are treated with respect and dignity. Every employee has the right to work in a professional atmosphere that promotes equal employment opportunity and prohibits discriminatory practices, including bullying and harassment. Frankly, this type of behavior is completely counter to our values and has no place at the Organization. This policy applies 24 hours a day, 7 days a week, so the harassing conduct need not occur at work or during working hours to be a violation. The Organization expects that all relationships among persons in the workplace will be free of bias, prejudice, and harassment.

DEFINITIONS

Bullying means repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others that violate dignity and respect.

Harassment means any unwelcome conduct on the basis of an individual's actual or perceived race, color, marital status, sex, religion, national origin, ancestry, age, order of protection status, disability, military status, sexual orientation, pregnancy, unfavorable discharge from military service, or citizenship status that has the purpose or effect of substantially interfering with the individual's work performance or creating an intimidating, hostile, or offensive working environment.

Organization means Start Early, its subsidiaries and affiliates.

Sexual Harassment constitutes discrimination and is illegal under federal, state, and local laws. Sexual harassment means any unwelcome sexual advances or requests for sexual favors or any conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

POLICY

The following types of conduct are prohibited by this policy and are deemed unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

1. Sexual Harassment

Sexual harassment may include a range of behaviors and may involve individuals of the same or different sex. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through email); and other physical, verbal or visual conduct of a sexual nature.

2. Harassment

Harassing conduct may include, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating, or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material (including through email) that shows hostility or aversion toward an individual or group.

3. Bullying

Bullying may include, but is not limited to: slandering, ridiculing, or maligning a person or family, persistent name calling that is hurtful, insulting or humiliating, using a person as the butt of jokes; physical bullying such as shoving, poking tripping; gesture bullying such as nonverbal threatening gestures or glances that convey threatening messages; and intentional exclusion such as socially or physically excluding or disregarding a person in work-related activities.

4. Retaliation

The Organization prohibits retaliation against any individual who reports discrimination, bullying, or harassment or participates in an investigation of such reports. Retaliation is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action.

PROCEDURE

Reporting an Incident of Harassment, Discrimination or Retaliation

The Organization requires the reporting of all incidents of discrimination, bullying, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe they have

encountered actions contrary to Start Early's policy or who have concerns about such matters should file their complaints promptly with their supervisor or People & Culture department.

Reporting Unwelcome Harassment

We sincerely hope that no one ever encounters any of the behaviors or situations described above. However, an employee who experiences inappropriate, offensive, or other unwelcome behavior by another person should let the person know that the conduct is unacceptable and then notify their supervisor or People & Culture department. If the employee is not comfortable speaking up to the person engaged in the unacceptable behavior, the employee should bring the matter directly to their supervisor or the People & Culture department.

No one should assume that conduct is acceptable simply because a complaint is not lodged. Moreover, it is important to remember that the Organization prohibits all inappropriate conduct, regardless of whether it is welcome or unwelcome, regardless of whether anyone complains about it and regardless of whether it rises to the level of unlawful harassment or discrimination.

Any individual (managers and non-managers) who witnesses or learns of any alleged harassment, discrimination, or inappropriate conduct should direct the affected employee to the People & Culture Department and also must report the incident immediately to the People & Culture Department, which will take appropriate action. Supervisors and managers who experience, witness, or learn of any alleged harassment, discrimination, or inappropriate conduct must immediately report it to People & Culture, irrespective of how they learned about it, whether they think it has merit, or whether the employees involved want it reported.

Investigation

Any reported allegations of harassment, bullying, discrimination, or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. Confidentiality will be maintained throughout the investigatory process to the extent possible to conduct an adequate investigation and take appropriate corrective action.

Responsive Action

Misconduct constituting harassment, discrimination, bullying, or retaliation will be dealt with appropriately. Responsive action may include, for example, training, counseling referral and/or disciplinary action, up to and including dismissal. False and malicious complaints, which are not made in good faith, may be the subject of the appropriate disciplinary action.

This policy prohibits conduct that may not be sufficient to establish a claim of harassment or discrimination in a court of law. We have established this policy to deter conduct that is inappropriate for the workplace, to create a positive culture where all team members can reach their potential, and to proactively prevent any legal claim of harassment or discrimination. Please note that, while this policy sets forth the Organizations goal of promoting a workplace that is free

of discrimination and harassment, the policy is not designed or intended to limit the Organizations authority to discipline or take remedial action for conduct the Organization deems unacceptable, regardless of whether that conduct satisfies the definition of harassment or discrimination. The goal is to address the problem before it ever advances to severe, pervasive, or unlawful harassment or discrimination.

RESOURCES

People Policies

REFERENCES

775 ILCS 5 Illinois Human Rights Act