

GLDC
SEXUAL HARASSMENT POLICY
AND COMPLAINT PROCESS

The purpose of this document is to familiarize supervisors and employees with the GLDC's policy on sexual harassment and the internal process that exists for the investigation and resolution of sexual harassment complaints.

SEXUAL HARASSMENT POLICY

I. POLICY STATEMENT

It is the policy of the GLDC to maintain a workplace and a work environment that is free of sexual harassment.

Sexual harassment of employees by managers, supervisors or co-workers or agents is prohibited by GLDC policy, is against the law, and will result in disciplinary action against any offender, up to and including dismissal.

II. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment in the workplace may take several forms. It includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that may be related to an individual's employment.

Conduct is considered related to employment when:

- submission to the conduct is explicitly or implicitly made a term or condition of an individual's employment
- submission to or rejection of the conduct by an individual is used as the basis for making an employment decision affecting the individual who submitted to or rejected the conduct or
- the conduct has the purpose, or effect, of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

A. DIRECT ("QUID PRO QUO") SEXUAL HARASSMENT

Sexual harassment may encompass implicit or explicit threats or insinuations by supervisors to employees that submission to or rejection of sexual advances will in some way influence personnel decision regarding employees:

- continuation of employment
- career development or access to training programs
- wages
- advancement
- work assignments
- shift assignments
- or any other condition of employment

B. "ENVIRONMENTAL" SEXUAL HARASSMENT

Other conduct, physical, or verbal, committed by supervisory or non-supervisory personnel, which contributes to an offensive or hostile work environment is also considered sexual harassment. This conduct includes but is not limited to:

- offensive or repeated and unwelcome sexual flirtations, advances or propositions
- offensive verbal abuse of a sexual nature
- graphic, verbal commentaries about a person's body
- sexually degrading words used to describe an individual
- the display of sexually suggestive object or pictures in the workplace

III. EMPLOYEE RESPONSIBILITIES

All employees have an obligation to assist the GLDC in maintaining a work environment free from sexual harassment - one in which all employees can work comfortably and productively. Therefore, employees are not only responsible for refraining from sexually harassing conduct but are also responsible for promptly reporting incidents of sexual harassment to which they are subjected, that they witness or of which they become aware.

Employees who witness an incident of sexual harassment, or who believe they are being sexually harassed, should report the incident to their supervisor, if

appropriate, or to the Personnel Office.

The GLDC will hold employees accountable for any acts of sexual harassment and will impose appropriate discipline - up to and including termination.

IV. SUPERVISOR/MANAGER RESPONSIBILITIES

Supervisory and management personnel have the following responsibilities:

- to comply with GLDC policy on sexual harassment and, at appropriate times and places, express strong support for it both in and out of the workplace.
- when appropriate, to promptly and thoroughly conduct investigations of any reported allegation of sexual harassment.
- to assist in and cooperate with investigations of allegations of sexual harassment by other GLDC personnel.
- to disseminate this policy to their subordinates through training or orientation sessions.
- to implement appropriate corrective and/or disciplinary action when allegations are substantiated.

IMPORTANT NOTE ON THE ACCOUNTABILITY OF MANAGERS AND SUPERVISORS FOR INACTION: The GLDC will hold any manager/supervisor to whom an instance of sexual harassment has been reported fully accountable if he or she fails to take appropriate action, including filing a prompt and complete report of the matter to a higher level of management and the President of the Board.

V. PREVENTIVE ACTION

In the long run, preventive measures are the best way of eliminating problems of sexual harassment. In this regard supervisors and managers are responsible for:

- knowing the company's policy on sexual harassment
- knowing the procedures for handling complaints
- sensitizing employees to the issue of sexual harassment
- expressing strong personal disapproval of sexual harassment or conduct which may be construed as sexual harassment

- raising employee awareness through training, staff meetings, discussions, and departmental programs
- NEVER ignoring a complaint
 - act promptly
 - investigate thoroughly and objectively with Personnel Department representatives
 - be fair and consistent in treatment
- informing employees of their right to raise the subject of harassment
 - advise employees that the GLDC wants to contact supervision or the Personnel Office representative, if appropriate, about any sexual harassment problem
 - reassure employees that any investigation of complaint will be conducted with due regard for the privacy interest of all involved
 - reassure employees that there will be no retaliation against anyone who raises a complaint in good faith

VI. INFORMAL COMPLAINT PROCESS

The GLDC maintains an informal EEO complaint process to investigate and resolve employee complaints.

Any employee who believes he or she is being sexually harassed should take the following action:

- don't ignore the situation - but consider carefully whether the conduct is sexual harassment
- if you feel uncomfortable over someone else's behavior, tell them so
- take immediate action
- if you're being solicited for sexual favors by a supervisor, say "no" to the offender and report the incident

- if you find your work environment oppressive because of conduct of a sexual nature - whether by supervisors or co-workers directly request that the conduct cease and report the incident

- if the conduct continues, inform an officer or a board member

- if the harasser is your immediate supervisor, the complaint may be registered with the next level of supervision and the President of the Board or another representative of the board.

VII. COMPLAINT INVESTIGATION

Any complaint of sexual harassment will be promptly and thoroughly investigated by an appropriate member of the board to verify whether a violation of law and GLDC's policy has occurred. Whether the allegations are verified, prompt and appropriate corrective action and disciplinary measures, up to and including dismissal, will be implemented.