



Woodbury Technologies, Inc.
Training For A Harassment Free Work Environment

Version 1-2015

The potential for harassment, including sexual harassment exists in every workplace.

The number of workplace harassment claims filed during recent years has increased dramatically.

While some individuals may feel that “harassment” means only “sexual harassment”, it has become clear that in today’s work environment the term is much broader than that.

Woodbury Technologies strives for a “harassment free”, positive work environment.

- It is the policy of WT to promote a productive work environment that is free from discrimination and harassment.
- WT will not tolerate verbal or physical conduct that harasses, disrupts or interferes with another's work performance or that creates an intimidating, offensive or hostile environment.
- Conduct that interferes with operations or discredits WT or is offensive to stakeholders or staff will not be tolerated.

- Harassment of an individual on the basis of race, color, sex, national origin, religion, age or disability is a discriminatory practice which is not tolerated at Woodbury Technologies.
- Although much attention has been given in recent years to sexual harassment discrimination, it is important to stress that many of the same principles apply to other types of harassment. We should all be vigilant in preventing any kind of harassment.



HARASSMENT DEFINED

Harassment

Harassment is severe or pervasive verbal or physical conduct that denigrates, shows hostility or aversion toward an individual because of his/her race, color, religion, gender, national origin, age, disability, or reprisal for participating in the Equal Employment Opportunity (EEO) process.

Sexual Harassment

Sexual harassment is unwelcome verbal or physical conduct of a sexual nature, requests for sexual favors, and other verbal or physical conduct of a sexual nature in which submission to or rejection of such conduct explicitly or implicitly affects an individual's work, for example:

- Submission to such conduct is made a term or condition of employment;
- Submission to or rejection of such conduct is basis for employment decisions;
- Conduct unreasonably interferes with job performance or creates an intimidating, hostile, or offensive work environment.



Teasing

- The act of playfully or maliciously disturbing another person (especially by ridicule); provoking someone with persistent annoyances.

Bullying

- An ongoing pattern of physical or psychological aggression that is threatening, coercive, relentless, and leaves the victim feeling powerless



- The conduct must be unwelcome to the target of the harassment. “Unwelcome” means that the employee did not solicit or incite the conduct and regards it as undesirable.
- The harasser can be the victim’s supervisor, an agent of the employer, a supervisor in another area, a co-worker, customer, or a non-employee.
- Harassment can be verbal, physical, or pictorial.
- The harasser as well as the target can be a man or woman.
- Claimant does not have to be the person at whom the offensive conduct is directed but can be anyone affected by the conduct.

- Comments or conduct that have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating or offensive working environment.
- This category of harassment is often more subtle than harassment that results in a tangible employment action, and is often more difficult to determine where the line falls between lawful and unlawful.
- The key issues here are frequency and severity.
- Anyone can commit this type of harassment - a management official, coworker or non-employee.

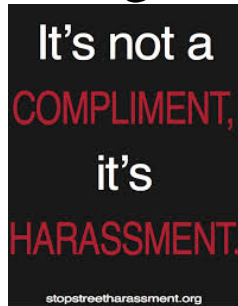
- Conduct must affect a term, condition, or privilege of employment.
- Can be based on race, color, religion, national origin, sex, sexual orientation, age or disability.
- Is severe or pervasive under a reasonable person standard.

- **Verbal:**
 - Derogatory comments, racial or sexual epithets, requests for sexual favors, sexual innuendoes, offensive jokes or stories, repeated propositioning.
- **Non-Verbal:**
 - Staring, derogatory or suggestive gestures, winking, throwing kisses, shunning, and ostracizing.
- **Visual:**
 - Offensive pictures, photos, cartoons, posters calendars, magazines or objects.
- **Physical:**
 - Unwelcome touching, hugging, kissing, patting, stroking, standing too close.
- **Written:**
 - Unwelcome personal letters, notes or emails.

- Sexual advances.
- Touches in a way that may make an individual feel uncomfortable.
- Displaying or distributing of sexually explicit drawings, pictures and written materials.
- Sexual gestures
- Sexual or "dirty" jokes.
- Pressure for sexual favors.
- Spreading rumors about or rating others as to sexual activity or performance.



- Making offensive remarks about looks, clothing or body parts
 - Using racially derogatory words, phrases, epithets
 - Using phrases or remarks about sexual orientation
- Demonstrations of a racial or ethnic nature such as the use of gestures, pictures or drawing which would offend a particular racial or ethnic group



- Comments about an individual's skin color or other racial/ethnic characteristics.
- Negative comments about an employee's religious beliefs
- Negative stereotypes regarding an employee's birthplace or ancestry.
- Negative comments about an employee's age when referring to employees 40 and over.
- Derogatory or intimidating references to an employee's mental or physical impairment.



PREVENTION

- Employees are expected to maintain a productive environment that is free from harassment or disruptive activity.
- No form of harassment will be tolerated including harassment for the following reasons: race, color, national origin, religion, sex, sexual orientation, disability or age.
- Any employee who believes that he/she is victim of unwelcome harassment has the responsibility to report or file a complaint about the situation to their Woodbury Technologies Manager or our Human Resource Manager as soon as possible.
- The report or complaint should be made to the employee's supervisor or senior management if the complaint involves the supervisor or manager.

- Avoid behavior that may be misconstrued as possible sexual harassment.
- Avoid sexual jokes, comments, and e-mails.
- Respect a person who indicates that your conduct or attention is not welcome.



- Not invade another individual's personal space.
- Not touch anyone without their permission.
- Clearly inform those engaging in inappropriate sexual orientated behavior that you find it objectionable.
- Seek assistance promptly if you are the target of or observe severe or repeated instances of behavior that you believe qualifies as sexual harassment.

Why is it important for employees to report discrimination, workplace harassment and sexual harassment?

- Discrimination, workplace harassment and sexual harassment can cause:
 - Employees to be hurt emotionally.
 - Productivity to go down.
 - Absenteeism to go up.
 - The work of the contract to be jeopardized.
 - Employees to be fearful of others.
 - Workplace morale to be reduced.
- When management knows about the problem it can be corrected.
- Discrimination, workplace harassment and sexual harassment must be stopped!



- **If a complaint has been filed, the response will be conducted in the following manner.**



- Workplace behavior will be monitored to ensure no retaliation.
- All complaints will be treated seriously and confidentially and will not ignore any allegation.
- Allegations will be responded to and will be investigated appropriately.
- The investigation will remain sensitive but impartial.
- Parties and relevant witnesses will be interviewed.
- Opened-ended questions may be asked.
- Relevant documentation/evidence will be collected
- Corrective action and follow-up steps will be taken.
- Monitor workplace to ensure no retaliation.
- Actions will be documented.

- All complaints will be investigated promptly - in as impartial and confidential a manner as possible.
- Employees are required to cooperate in any investigation.
- A timely resolution of each complaint should be reached and communicated to the parties involved.
- Any employee, supervisor, or manager who is found to have violated the harassment policy will be subjected to appropriate disciplinary action, up to and including termination.
- If a complaint involves the conduct of someone who is not a WT employee we will follow our internal procedures and take prompt, appropriate action when brought to the agencies attention



- Retaliating against employees who file complaints, participate in investigations or report observing discrimination, workplace harassment or sexual harassment is prohibited.
- If an employee believes he/she has been retaliated against, the employee should report the retaliatory behavior to his/her Woodbury Technologies Manager or our Human Resource Manager.
- Complaints of retaliation will be investigated promptly.

Together we must work to create and maintain a work environment that is free from discrimination, workplace harassment and sexual harassment.

Please make sure you sign and date the acknowledgment form and return to your ECM or Human Resources.