

Anti-Discrimination and Harassment Policy and Complaint Procedure

Union is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Union expects that all relationships among persons in the office will be business-like and free of bias, prejudice and harassment.

It is the policy of Union to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, sex, gender (including gender identity and expression), pregnancy, religion, creed, national origin, age, alienage and citizenship status, status as a perceived or actual victim of domestic violence, physical or mental disability, marital status, sexual orientation, military status, partnership status, genetic predisposition or carrier status, or any other individual or groups of individuals protected by federal, state or local laws.

Union encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Union to promptly and thoroughly investigate such reports. Union prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

Definitions of Harassment

Sexual Harassment

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or c) 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.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include 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, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

Other Harassment

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, gender, sexual orientation, national origin, age, disability, marital status, citizenship, genetic information or any other characteristic protected by law or that of his/her relatives, friends or associates, and that a) has

the purpose or effect of creating an intimidating, hostile or offensive work environment; b) has the purpose or effect of unreasonably interfering with an individual's work performance; or c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group, and that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment via e-mail, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

Individuals and Conduct Covered

These policies apply to all applicants employees, and others who perform services to Union (i.e., consultants, contractors, interns, etc.) whether related to conduct engaged in by fellow employees or someone not directly connected to Union (e.g., an outside vendor, consultant or visitor).

Conduct prohibited by these policies is 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.

Complaint Process

Individuals who believe they have been the victims of conduct prohibited by this policy statement or who believe they have witnessed such conduct should discuss their concerns with their immediate supervisor, the Office of Human Resources or any member of management.

When possible, Union encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. Union recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

Union strongly urges the prompt reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe they have experienced conduct that they believe is contrary to the Union's policy or who have concerns about such matters should file their complaints with their immediate supervisor or the Office of Human Resources. Individuals should not feel obligated to file their complaints with their immediate supervisor first before bringing the matter to the attention of one of the other Union-designated representatives identified above. **The Complaint Form For Reporting Harassment/Discrimination is included in Appendix I of the Policy.**

Employees who have experienced conduct they believe is contrary to this policy have an obligation to take advantage of this complaint procedure. Managers and supervisors are **required** to report any complaint that they receive, or any harassment that they observe to the Office of Human Resources. Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. Union strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. Union will make every effort to stop alleged harassment before it becomes severe or pervasive but can

only do so with the cooperation of its employees.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly, thoroughly, and impartially. 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. Additionally, the investigation may include a review of relevant documents, emails or phone records, as applicable.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action. We urge any individuals who participate in the investigative process to keep all information confidential. All employees and third parties doing business with Union are expected to cooperate in any investigations conducted by or on behalf of Union.

When Union has completed its investigation, it will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of the investigation. Misconduct constituting harassment, discrimination or retaliation will be dealt with promptly and appropriately. If Union determines that an employee is guilty of harassing another individual, appropriate disciplinary action will be taken against the offending employee up to and including termination of employment.

If a party to a complaint does not agree with its resolution, that party may appeal to the President of Union or their designee.

False and malicious complaints of harassment, discrimination or retaliation may be the subject of appropriate disciplinary action.

Retaliation

Union prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed. If an employee feels he or she has been subjected to any such retaliation, he or she should bring it to the attention of the Office of Human Resources.

Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described above.

External Remedies

All forms of discrimination and harassment, including sexual harassment, are not only prohibited by Union's policy, but are also prohibited by federal, state and local law. In addition to the

internal complaint procedures outlined above, employees may also choose to pursue legal remedies in state or federal court or with administrative agencies, which have the authority to award various forms of relief. Please be mindful that failure to use Union's internal complaint procedure may limit an individual's ability to file or maintain a claim with an administrative agency or in a lawsuit.

In New York City, the applicable governmental agencies are: The United States Equal Employment Opportunity Commission (EEOC) – For more information, visit www.eeoc.gov; The New York State Division of Human Rights (DHR) – For more information, visit www.dhr.ny.gov; The New York City Commission on Human Rights (CHR) – For more information, visit www.nyc.gov/html/cchr/html/home/home.shtml.

Finally, if the harassment involves unwanted physical touching, coerced confinement or coerced sexual acts, employees may want to contact the local police department.

**APPENDIX I
COMPLAINT FORM FOR REPORTING HARASSMENT/DISCRIMINATION**

If you believe that you have been subjected to or have witnessed workplace harassment or discrimination, you may use this form to provide information supporting your concern(s) to the Chief Human Resources Officer & Title IX Coordinator, or any of the other individuals identified in Union’s Non-Discrimination And Anti-Harassment Policy. If you are more comfortable reporting verbally or in another manner, you may do so.

COMPLAINANT INFORMATION

Name: _____

Work Phone: _____ Job Title: _____ Email: _____

Preferred Communication Method:

COMPLAINT INFORMATION

1. Please describe the conduct or incident(s) that is the basis of this complaint, including the name and contact information of any relevant witnesses, relevant dates/locations of the conduct or incident(s) discussed, and your reasons for concluding that the conduct is harassment or discrimination. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

2. Have you previously complained or provided information (verbal or written) about the conduct or incident(s) to a supervisor, manager, and/or the Office of Human Resources?

Yes No

If yes, when and to whom did you complain or provide information?

3. Have you filed a claim regarding this matter with a federal, state or local government agency?

Yes No

Have you instituted a legal suit or court action regarding this matter?

Yes No

Have you retained legal counsel with respect to this matter?

Yes No

I affirm the information I am providing is accurate to the best of my recollection and that I will cooperate in Union’s investigation of this matter.

Signature: _____ Date: _____