

## Anti-Discrimination and Harassment Policy

LAST AMENDED AUGUST 2019

### 1. Equal Opportunity Employment Policy

ICNL is committed to equal employment opportunity. No decisions concerning hiring, employment, advancement, training opportunities, or any other benefit or form of compensation will be made of an applicant's or employee's age, sex (including pregnancy), ethnicity, race, creed, color, religion, marital status, matriculation, sexual orientation, genetic information, gender identity or expression, family responsibilities, physical or mental disability, veteran status, military status, political affiliation, national origin or ancestry, personal appearance, or any other basis prohibited by District of Columbia or Federal or other applicable law.

ICNL does not discriminate in its hiring or employment practices against qualified individuals with disabilities who can perform the essential job functions with or without reasonable accommodation. Employees who need a reasonable accommodation should inform their supervisor of their condition as soon as possible. All medical information received by ICNL's management will remain personal and confidential.

### 2. Misconduct

#### 2.1. PROHIBITION AGAINST HARASSMENT

ICNL prohibits harassment, including sexual harassment, of or by any of its employees. Prohibited harassment includes harassment based on age, sex, pregnancy, ethnicity, race, creed, color, religion, marital status, matriculation, genetic information, gender identity or expression, family responsibilities, physical or mental disability, veteran status, military status, sexual orientation, political affiliation, national origin or ancestry, personal appearance, or any basis prohibited by law.

Sexual harassment, which could occur on ICNL premises or anywhere else that ICNL work-related activity takes place, is defined as unwelcome sexual advances, requests for sexual favors or verbal or physical conduct of an improper sexual nature when (1) submission to such conduct is made explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) 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 is a form of sexual discrimination, and neither sexual harassment nor discrimination will be tolerated by ICNL.

ICNL also prohibits harassment of or by employees based on any other characteristics described above. To be clear, ICNL's prohibition on sexual and other forms of harassment is not limited to harassment of an employee by another employee, but also extends to harassment of an employee by a third party, such as a client, contractor, volunteer, or any other third party with whom an ICNL employee might interact as part of his or her work. ICNL's prohibition on harassment likewise extends to an ICNL employee's harassment of third parties with whom the employee might interact as part of his or her work. Any employee who harasses another person on any of the bases described above may be subject to discipline up to and including discharge. While it is not easy to identify precisely what conduct constitutes harassment, prohibited conduct includes slurs, epithets, derogatory comments, demeaning names, unwelcome flirting, suggestive remarks, discussion of sexual activity, sexually-suggestive gestures, inappropriate jokes, teasing, sexual advances, unwelcome touching, displays of sexually explicit images, requests for sexual favors, or other similar verbal, physical, or digital conduct.

### 3. Discrimination and Harassment Reporting Procedures

Any employee who feels that he or she is a victim of discrimination, sexual harassment, or any other form of prohibited harassment or who is aware of discrimination or harassment of or by another employee—should immediately report it in accordance with the following procedure. With respect to harassment, employees are also encouraged to tell the offender that the conduct is unwelcome and should stop immediately. All complaints will be investigated in a timely manner, and steps taken to investigate and respond to accusations will be guided by whether the alleged incident falls under the category of incivility, misconduct according to organizational policies, or criminal behavior.

- a. Any employee who believes that he or she or someone else is a victim of discrimination or harassment should report the conduct immediately to his or

her supervisor. If the employee prefers not to discuss the matter with his or her supervisor, he or she should report the incidence directly to the President, his designee expressly named for this purpose (i.e., the Vice President of Operations), or the Chair of the Board of Directors.

- b. Supervisors who become aware of discriminatory or harassing conduct or a complaint of discrimination or harassment must report the conduct and/or complaint immediately to the President, his/her designee expressly named for this purpose (i.e. the Vice President of Operations), or the Chair of the Board of Directors.
- c. ICNL management will promptly investigate every reported incident, including deciding whether an independent investigator is required. Any employee at any level of ICNL who has been found to have engaged in prohibited discrimination or harassment be subject to appropriate disciplinary action, up to and including discharge. When appropriate, a victim who reports discrimination or harassment may be informed of the conclusion or outcome of the investigation.
- d. ICNL will conduct all investigations in a discreet manner and will treat all complaints as sensitive or confidential to the extent consistent with a thorough investigation. ICNL will limit its disclosure of information to those individuals to whom it needs to reveal certain information in order for ICNL to investigate the complaint. ICNL recognizes that every investigation requires a determination based on all the facts in the matter.
- e. ICNL encourages and requires the reporting of complaints to help protect anyone from being subject to prohibited discrimination or harassment.
- f. ICNL strictly prohibits retaliation against any person who raises a good faith complaint or concern about prohibited discrimination or harassment. Employees who retaliate in any way in violation of this policy will be subject to discipline, up to and including discharge.
- g. ICNL will provide training and resources to staff to effectively implement this policy.