

## ANTI- HARASSMENT POLICY

All Unlawful Harassment Prohibited The Company is committed to maintaining a work environment that is free of harassment based on race, color, religious creed, sex, pregnancy, sexual orientation, national origin, ancestry, age, marital or civil union status, veteran status, present or past history of mental and physical disability, intellectual disability, gender identity or expression, genetic information, or other characteristic protected by applicable federal, state or local law. Sexual Harassment All employees, other workers and representatives (including vendors, residents, and visitors) are prohibited from harassing employees and other covered persons based on that individual's sex or gender (including pregnancy and status as a transgender or transsexual individual) and regardless of the harasser's sex or gender.

Commented [SGG1]: Notice of the illegality of sexual harassment must be emailed to those employees who have either company email accounts or personal email accounts of which you are aware. For all other employees, an employer should post information on its website and include the link in the handbook for future employees. For current employees, notifying employees in writing of how to access the information on the company's website is advised.

10311589v2 7 Sexual harassment means any harassment based on someone's sex or gender. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature, when any of the following is true:

- Submission to the advance, request or conduct is made either explicitly or implicitly a term or condition of employment.
- Submission to or rejection of the advance, request or conduct is used as a basis for employment decisions.
- Such advances, requests or conduct have the purpose or effect of substantially or unreasonably interfering with an employee's work performance by creating an intimidating, hostile or offensive work environment. We will not tolerate any form of sexual harassment, regardless of whether it is:
  - Verbal (for example, epithets, derogatory statements, slurs, sexually-related comments or jokes, unwelcome sexual advances or requests for sexual favors).
  - Physical (for example, assault or inappropriate physical contact).
  - Visual (for example, displaying sexually suggestive posters cartoons or drawings, sending inappropriate adult-themed gifts, leering or making sexual gestures).
  - Online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.). This list is illustrative only, and not exhaustive. No form of sexual harassment will be tolerated. Harassment is prohibited both at the workplace and at employer-sponsored events.

### Other Types of Harassment

This anti-harassment policy applies equally to harassment based on an employee's race, color, religious creed, sex, pregnancy, sexual orientation, national origin, ancestry, age, marital or civil union status, veteran status, present or past history of mental and physical disability, intellectual disability, gender identity or expression, genetic information, or other characteristic

protected by applicable federal, state or local law. Such harassment often takes a similar form to sexual harassment and includes harassment that is:

- Verbal (for example, epithets, derogatory statements, slurs, derogatory comments or jokes)
- Physical (for example, assault or inappropriate physical contact).
- Visual (for example, displaying derogatory posters, cartoons, drawings or making derogatory gestures).
- Online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.). This list is illustrative only, and not exhaustive. No form of harassment will be tolerated. Harassment is prohibited both at the workplace and at employer-sponsored events.

#### 10311589v2 8 Complaint Procedure

If you are subjected to any conduct that you believe violates this policy or witness any such conduct, you must promptly report it. You may tell the offender that his or her behavior is unwelcome. In reporting the complaint you should contact your direct supervisor or, if the conduct involves your direct supervisor, you should promptly report the situation to the Director/ Administrator. If an employee has a sexual harassment complaint that involves the Director/ Administrator, he or she should **contact the Sr. Executive Director, Ron Bucci at (203) 761-1191**. Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. We will directly and thoroughly investigate the facts and circumstances of all claims of perceived harassment and will take prompt corrective action, if appropriate. All employees are to cooperate fully with any investigation of workplace harassment. Employees who interfere with, hinder or refuse to cooperate in such investigations may be subject to disciplinary action, up to and including termination. Consistent with the needs of the investigation and to the extent possible, we will maintain confidentiality during the course of an investigation into a complaint of harassment.

#### No Retaliation

No one will be subject to, and we prohibit, any form of discipline, reprisal, intimidation or retaliation for good faith reporting of incidents of harassment of any kind, pursuing any harassment claim or cooperating in related investigations. We are committed to enforcing this policy against all forms of harassment. However, the effectiveness of our efforts depends largely on employees telling us about inappropriate workplace conduct. If employees feel that they or someone else may have been subjected to conduct that violates this policy, they must report it immediately. If employees do not report harassing conduct, we may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

#### Violations of This Policy

Any employee, regardless of position or title, whom we determine has subjected an individual to harassment or retaliation in violation of this policy, will be subject to discipline, up to and including termination of employment.

## SEXUAL HARASSMENT TRAINING

All employees hired before October 1, 2019, who have not taken part in Company sexual harassment training after October 1, 2018, will be required to take part in Company sexual harassment training by no later than October 1, 2020. Employees hired on or after October 1, 2019 shall receive sexual harassment training within 6 months of hire.