



## **Equal Employment Opportunity and Harassment Policies**

### **Equal Employment Opportunity Policy**

New Incentives is an equal opportunity employer. We are committed to the principles of Equal Employment Opportunity and are committed to making employment decisions based on merit and value. We are committed to complying with all Federal, State, and local laws providing Equal Employment Opportunities, as well as all laws related to terms and conditions of employment. We desire to maintain a work environment free of harassment or discrimination due to sex (including pregnancy or gender), race, religion (including religious dress and grooming practices), color, national origin, sexual orientation, gender identity or gender expression, citizenship, physical or mental disability, marital status, familial status, ancestry, status as a victim of domestic violence or sexual assault, age or any other status protected by Federal, State or local laws ("Protected Class"). Any employee who feels this policy has been violated should use the reporting procedure established in the section below, "How to Report a Violation of Policy".

### **Sexual Harassment Policy**

New Incentives prohibits sexual harassment of its employees and applicants for employment by any employee, non-employee, third party, client or applicant. Such conduct may result in disciplinary action up to and including discharge. This policy covers all employees. New Incentives will not tolerate, condone or allow sexual harassment, whether engaged in by fellow employees, supervisors, associates, clients or others who conduct business with New Incentives.

Sexual harassment is any behavior that includes unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature when:

- Submission to, or rejection of, such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or is used as a basis for employment decisions; or •
- 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.

New Incentives will not tolerate any form of sexual harassment, whether verbal (epithets, derogatory statements, slurs, sexually-related comments, unwelcome sexual advances, requests for sexual favors), physical (assault or inappropriate physical contact) or visual (posters, cartoons and drawings).

No manager or supervisor shall threaten or imply that an employee's refusal to submit to sexual advances will adversely affect that person's employment, compensation, advancement, assigned duties, or any other term or condition of employment or career development. Sexual joking, lewd pictures and any conduct that tends to make employees "sex objects" is prohibited.

New Incentives employees are entitled to work in an environment free from sexual harassment and a hostile or offensive working environment. We recognize sexual harassment as unlawful discrimination, akin to conduct that belittles or demeans any individual on any other Protected Class. Any individual at any time, even after separation of employment, who feels this policy has been violated should use the reporting procedure established in the section below, "How to Report a Violation of Policy".

## **Anti-Harassment Policy**

In addition to prohibiting sexual harassment, New Incentives also prohibits harassment of any employee based on an individual's "Protected Class".

Harassing an employee may be grounds for immediate discharge. While it is not easy to define what harassment is, examples include verbal (including improper joking or teasing) or physical conduct that denigrates or shows hostility or aversion towards an employee because of their Protected Class. Any individual at any time, even after separation of employment, who feels this policy has been violated, should use the reporting procedure established in the section below, "How to Report a Violation of Policy".

## **How to Report a Violation of Policy**

If you believe that someone has violated any employment policy (whether or not the alleged harasser is a co-worker, contributor, client, etc.) you should bring the matter to the immediate attention of any manager or supervisor, or the CEO. New Incentives will promptly investigate the facts and circumstances of any claim of perceived harassment or discrimination. To the extent possible, New Incentives will endeavor to keep the complaining employee's concerns confidential. In the event you have not received a satisfactory response within five (5) days after reporting any incident of what was perceived to be harassment or discrimination, immediately contact the Board Chair.

No employee will be subject to, and New Incentives prohibits any form of discipline or retaliation for, reporting incidents of harassment or discrimination in violation of New Incentives's employment policies, pursuing any such claim or cooperating in the investigation of such reports.

New Incentives is committed to enforcing these employment policies against all forms of harassment and discrimination. The effectiveness of our efforts will depend largely on your telling us about inappropriate workplace conduct. If you feel that you or someone else may have been subjected to conduct which violates these policies, you should report it immediately. If employees do not report such conduct, New Incentives may not become aware of possible violations of these policies and may not be able to take appropriate corrective action.

Retaliation is a serious violation of these policies and should be reported immediately. Any person found to have retaliated against another individual for reporting discrimination or harassment will be subject to appropriate disciplinary action, up to and including termination.