



ANTI-DISCRIMINATION POLICY

CIEE (Council on International Educational Exchange) is proud of its policy of supporting a work environment that encourages respect for individual dignity. Therefore, CIEE endeavors to maintain a work environment free from unlawful discrimination based on gender identity and expression, sexual orientation, race, religion, national origin, ethnicity, age, (dis)ability, and any other categories protected by applicable law (“Protected Characteristic”). CIEE prohibits any form of discrimination, or intimidation of an employee based on a **Protected Characteristic** whether at the office, during outside work assignments, at CIEE-sponsored social or non-social functions, or outside of work time and off company premises. CIEE also prohibits any sexual harassment (defined below). Should any such violation of this policy occur, CIEE will take proper corrective action to prevent its continuation or recurrence. In addition, CIEE will endeavor to prevent the discrimination, intimidation, or sexual harassment of its employees by persons who are not CIEE employees, but who are on CIEE’s premises or who have business- such as vendors and clients- with CIEE. Employees who see or experience violations of this policy should follow the reporting procedures set forth below so that corrective action may be taken. Any individual found to have violated this policy will be subject to disciplinary action, up to and including termination.

DEFINITIONS

"Harassment" is verbal or physical conduct that demeans or shows hostility or aversion toward an individual for any reason, but particularly including, without limitation, such conduct directed toward an individual’s race, color, religion, sex, age, national origin, ancestry, creed, citizenship, alienage, marital status, sexual orientation, gender identity physical or mental disability, veteran status, gender identity, whistleblower status, or any other **Protected Characteristic** and that:

- Has the purpose or effect of creating an intimidating, hostile, or offensive work environment;
- Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- Otherwise adversely affects the individual's employment opportunities.

Harassing conduct includes, without limitation: slurs, epithets, or negatives stereotyping; threatening, intimidating, or hostile acts; denigrating jokes, or the display or circulation in the workplace of written or graphical material that denigrates or shows hostility or aversion toward an individual or group.

"Sexual harassment" is defined as sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made (either explicitly or implicitly) a term or condition of an individual's employment;
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual Harassment includes: making unwelcome sexual advances, requesting sexual favors, or engaging in verbal, non-verbal, or physical conduct of a sexual nature which is made a term or condition of employment, or which is used as the basis for employment decisions. "Sexual harassment" also includes any type of sexually oriented conduct, including conduct intended to be friendly or humorous, that is unwelcome and has the purpose or effect of unreasonably interfering with an employee's work performance or creating a work environment that is intimidating, hostile, offensive or coercive to a reasonable person.

The severity of the conduct and the degree of pervasiveness involved are considered when determining whether conduct constitutes sexual harassment. The following is a non-exhaustive list of conduct which could be considered sexual harassment:

- Threats or insinuations, either explicitly or implicitly, that refusal to submit to sexual advances or sexual conduct will adversely affect an individual's employment, evaluation, wages, advancement, assigned duties, benefits or any other aspect of employment or career advancement;
- Preferential treatment or promise of preferential treatment to an employee for submitting to sexual conduct, including soliciting or attempting to solicit any employee to engage in sexual activity for compensation or reward;
- Sexual jokes, language, epithets, advances or propositions;
- Written or verbal abuse of a sexual nature or use of sexually degrading or sexually vulgar words to describe an individual;
- Display of sexually suggestive objects, pictures, posters or cartoons;
- Comments about an individual's body, sexual prowess or sexual deficiencies;
- Asking questions about sexual conduct;
- Unwelcome touching, leering, whistling, brushing against the body, or suggestive, insulting, or obscene comments or gestures and assault or coerced sexual acts;
- Written statements, including those placed on the Internet, about an individual, including but not limited to comments about an individual's body, appearance, or sexual behaviors;
- Other physical, verbal, or visual conduct of a sexual nature; or
- Any retaliation, or threat of retaliation against a person who has made a complaint of sexual harassment.

Any retaliation, intimidation or threat of retaliation or intimidation against a person who has refused or rebuffed sexual advances, refused to participate in sexual conduct as described above, or objected to offensive sexual conduct or comments.

RESPONSIBILITIES

Responsibility of Supervisors

Each CIEE employee, and particularly those who supervise other employees, has a duty to maintain a workplace free of harassment, to assure that everyone under their supervision is aware of CIEE's policy on harassment and discrimination, and the policy's resolution procedure, and to assure such individuals are entitled to work in an environment free from insulting, degrading or exploitative treatment based on gender identity and expression, sexual orientation, race, religion, national origin, ethnicity, age, (dis)ability, and any other category protected by applicable law. Any supervisor who learns of or suspects violations of this policy must promptly bring the matter to the attention of Human Resources.

All US employees of CIEE are required to complete an online harassment prevention training course within one year of hire and every two years thereafter.

Responsibility of Employees

CIEE encourages individuals who believe they are or may have been the subject of harassment, discrimination, or sexual harassment to communicate to the offending party that the conduct is unwelcome. If the individual is uncomfortable with directly communicating with the offending party, then the individual may use the internal reporting procedure to gain support.

INTERNAL REPORTING PROCEDURE

If you believe you are the victim of illegal harassment or other illegal discrimination, or witness what you believe to be illegal harassment or discrimination, you should follow the below guidelines to report the incident/s:

- Report it immediately to your supervisor so that CIEE can take prompt and appropriate action given the circumstances;
- If for any reason you are uncomfortable approaching your supervisor (if for example, your supervisor is the person you feel is engaging in behavior that violates this policy), or if you feel that the matter is not being adequately addressed, please bring the matter to the attention of the next level of management or to Human Resources (humanresources@ciee.org) as soon as possible.

Employees should also report any work-related harassment or discrimination by non- employees, such as vendors, or clients. CIEE will endeavor to address any such situations that arise consistent with the intent of this policy. In these instances it's also important to report the incident immediately.

If a complaint is made, CIEE will investigate. If CIEE's investigation reveals that a violation of this policy occurred, appropriate action will be taken, which may include disciplinary action up to and including termination of employment. CIEE may take action up to and including termination of employment even if it determines that the prohibited conduct was not unlawful.

Confidentiality will be maintained to the extent possible without jeopardizing a full investigation. When the investigation has been completed, CIEE will endeavor to inform the reporting party of the results of the investigation, to the extent CIEE considers it appropriate under the circumstances.

No employee will be disciplined or otherwise retaliated against for making a good-faith complaint about a perceived violation of this policy or cooperating in an investigation of a complaint. Such retaliation is unlawful regardless of the outcome of CIEE's investigation, and any individual found to have engaged in retaliation will be subject to disciplinary action, up to and including termination of employment.

CIEE understands that false or malicious accusations, especially of sexual harassment, have serious effects on innocent people. If, after investigating a complaint under this policy, CIEE concludes that a complainant has knowingly and/or maliciously supplied false information, it may

act against that individual that maliciously supplied false information, up to and including formal discipline or termination of employment.

If you believe that CIEE has not responded appropriately to a complaint of discrimination or harassment, you may contact the VP of Human Resources or the Chief Executive Officer and President of CIEE. Employees also have the right to contact following government agencies responsible for investigating claims of discrimination or harassment in the workplace:

Maine Human Rights Commission

51 State House Station, Augusta, Maine 04333-0051
(207) 624-6050

or

Federal Equal Employment Opportunity Commission

John F. Kennedy Federal Building
475 Government Center, Boston, MA 02203
(617) 565-3200

WHISTLEBLOWER PROTECTION

CIEE will not retaliate (discharge, threaten or otherwise discriminate) against an employee who reports any wrongdoing as protected by law. The following types of activities are protected:

- In good faith, reporting to the company or a public body what the employee reasonably believes is a violation of a law or regulation;
- In good faith, reporting to the company or a government agency mentioned above what the employee reasonably believes is a condition or practice that would put at risk the health or safety of that employee or any other individual;
- Participating in, or being asked to participate in, an investigation, hearing or inquiry held by a public body, or in a court action;
- In good faith, refusing to carry out a directive to engage in activity that would be a violation of a law or regulation, or that would expose the employee or any individual to a condition that would result in serious injury or death, after having sought and been unable to obtain a correction of the illegal activity or dangerous condition from the employer.

CIEE will not permit retaliation of any kind against anyone who reports a violation of this policy or participates in good faith in an investigation of a complaint involving violations of this policy. Such retaliation is unlawful, and any individual found to have engaged in retaliation will be subject to disciplinary action, up to and including termination of employment.