



## **INTERNATIONAL LIFEGUARD CRITICAL INCIDENT RESPONSE ALLIANCE**

### **Work Environment Policy**

This Work Environment Policy applies to everyone working on behalf of the company in the U.S., including but not limited to, regular domestic team members, contract workers, temporary workers and non-team members on International Critical Incident Response Alliance's (ILCIRA) property. ILCIRA prohibits discrimination, harassment, retaliation, threats and workplace violence against our team members, contractors, subcontractors, vendors, consultants, temporary workers or anyone else on our property.

Internationally based team members and volunteers should refer to their divisions governing documents. All team members should refer to the Federal and State Resources page for state-specific guidance and additional information.

We're a global organization, made up of a diverse employee & volunteer workforce. We should celebrate our differences, and nothing less. Respecting one another is a core value of our culture. We will not tolerate discrimination, harassment, bias-related behavior, threats of workplace violence, or other inappropriate behavior. Nor will we tolerate retaliation against anyone who speaks up about, reports, or participates in an investigation involving discrimination, harassment, retaliation, or any inappropriate behavior.

ILCIRA strictly prohibits discrimination and harassment based on race, color, religion or religious creed, gender, marital status, gender identity, gender expression, sexual orientation, national origin, ancestry, ethnic origin, citizenship, age, military and protected veteran status, genetic information, pregnancy, disability, medical condition or any basis protected by law. Discrimination occurs if you treat someone differently based on one of these protected characteristics.

How to report discrimination, harassment, retaliation, threats or workplace violence

We can't stress it enough, ILCIRA does not tolerate discrimination, harassment, retaliation for making a complaint of discrimination or harassment, or participating in an investigation of such a complaint, threats

Here is how to report it:

- Tell your Manager
- Contact the Executive Director / CEO
- Send an email to: [compliance@ilcira.org](mailto:compliance@ilcira.org)

All good faith complaints will be timely and impartially investigated, and appropriate action will be taken to prevent and promptly correct any inappropriate behavior. To the extent possible, we will investigate complaints with due regard for privacy and confidentiality of all persons involved. Complete confidentiality may not be possible in all circumstances, however. During the investigation, we generally will interview the complainant and the accused, conduct further interviews as necessary, and review any relevant documents or other information. Team members must cooperate with our investigation. Upon completion of the investigation, we will determine whether company policy has been violated based upon our reasonable evaluation of the information gathered during the investigation. We will inform the complainant of the results of the investigation.

We also will take prompt and appropriate corrective action to stop misconduct and prevent its recurrence, if we determine such measures are necessary. As circumstances warrant, this corrective action may include warning, counseling, transfer, suspension, or termination. Anyone found violating this policy, including managers and supervisors, and regardless of position or title, will be subject to discipline, up to and including termination

We won't retaliate or otherwise hold complaints made in good faith against a team member who reports inappropriate conduct or participates in an investigation of such conduct. Remember, it is everyone's job to report harassment and to cooperate in the company's investigation of such reports.

Together, we have the opportunity to create a safe and inviting place to work, a workplace that sets us apart.

#### No Discrimination/No Harassment

Internationally based team members should refer to their division policies.

ILCIRA strictly prohibits discrimination and harassment based on race, color, religion or religious creed, gender, marital status, gender identity, gender expression, sexual orientation, national origin, ancestry, ethnic origin, citizenship, age, military and protected veteran status, genetic information, pregnancy, disability, medical condition or any basis protected by law. Discrimination occurs if you treat someone differently based on one of these protected characteristics.

You play an important role in creating a workplace that is free from discrimination and harassment. We're all accountable — including our leaders. Types of unacceptable behavior in the workplace may take a variety of forms including verbal, physical, and visual contact, threats and demands. Examples may include, but are not limited to:

- Bias-related behavior — behavior that suggests hatred for, or hostility toward, a person or group because of their race, sex, sexual orientation, gender identity, religion, or any other protected characteristic. This may include, but is not limited to, bigoted slurs, drawings, and symbols such as a hangman's noose, a swastika, or graffiti.
- Verbal conduct, such as epithets, demeaning or derogatory comments, jokes, negative stereotyping, slurs or any term or code name that denigrates or disparages others, including but not limited to verbal conduct about race or ethnicity.
- Physical conduct such as assault, unwelcome touching, blocking normal movement, interfering with work, or threatening, intimidating, or offensive behavior that relates to the factors described above.
- Visual conduct such as derogatory or otherwise offensive posters, cards, objects, symbols, calendars, photographs, cartoons, graffiti, drawings, jokes, letters, e-mail, or gestures that denigrate or show hostility toward an individual or group.

This applies to us all, including anyone working on behalf of the company. If you feel that you have been discriminated against or harassed, or you see it happening to someone else, you must report it.

#### No Intimidation/No Violence

No one wants to work for a company where harassment, intimidation or violence lives. To be absolutely clear, ILCIRA prohibits threats and workplace violence toward our team members, vendors, or anyone on our property. In no shape or form will the following be tolerated:

- Physically or verbally threatening or intimidating another individual while at work, including acts of bullying;
- The intentional destruction or threat of destruction of company or another's property;
- Harassing or threatening a team member while at work, including phone calls or written communications;
- Stalking at work; and
- Advocating illegal use of firearms, bombs, or weapons while at work.

If you witness or are aware of any violent or potentially violent or intimidating conduct, do the right thing and report it to your local management as quickly as possible. They'll take it from there, making an initial assessment of the situation and contacting the Executive Director as needed

#### No Sexual Harassment

ILCIRA is committed to fostering a work environment that is free from sexual harassment, and that includes retaliation for raising a sexual harassment complaint in good faith, cooperating in an investigation of sexual harassment complaint, or testifying or assisting in any related legal proceeding. Sexual harassment is team member misconduct. Sexual harassment and retaliation not only undermine our workplace culture and violate our policies, but they also are unlawful.

The U.S. Equal Employment Opportunity Commission defines sexual harassment as unwelcome sexual advances, requests for sexual favors and other verbal, or physical conduct of a sexual nature when:

- Submission to such conduct by an individual is made explicitly or implicitly a term or condition of employment;
- Submission to, or rejection of, such conduct by an individual is used as a basis for an employment decision; and/or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Examples of sexual harassment may include:

- Making or threatening retaliation after a negative response to sexual advances;
- Offering employment benefits in exchange for sexual favors;
- Visual conduct — leering, making sexual gestures, displaying of sexually suggestive objects, pictures, cartoons, or posters;
- Verbal conduct — making or using derogatory comments, epithets, slurs, sexually explicit jokes, sexual innuendoes, comments about a team member's body or dress;
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, notes or invitations; and
- Physical conduct — unwelcome touching or massages, assault, impeding, or blocking movements.

If you are offended by inappropriate conduct in the workplace, you should report the incident using the “how to report” information below. You should report the conduct even if you feel that you have addressed the situation by telling the perceived harasser you are offended by the behavior and/or remarks and you want it to stop.

### No Retaliation

ILCIRA encourages all team members to report any conduct they believe is discriminatory or harassing. ILCIRA will not retaliate against any team member who reports in good faith such conduct, participates in an investigation of such conduct, or testifies or assists in any related legal proceeding. If you believe another team member is retaliating against someone for reporting inappropriate conduct or participating in an investigation of such conduct, report it.

### Investigations

All good faith complaints will be timely and impartially investigated, and appropriate action will be taken to prevent and promptly correct any inappropriate behavior. To the extent possible, we will investigate complaints with due regard for privacy and confidentiality of all persons involved. Complete confidentiality may not be possible in all circumstances, however. During the investigation, we generally will interview the complainant and the accused, conduct further interviews as necessary, and review any relevant documents or other information. Team members must cooperate with our investigation. Upon completion of the investigation, we will determine whether company policy has been violated based upon our reasonable

evaluation of the information gathered during the investigation. We will inform the complainant of the results of the investigation.

We also will take prompt and appropriate corrective action to stop misconduct and prevent its recurrence, if we determine such measures are necessary. As circumstances warrant, this corrective action may include warning, counseling, transfer, suspension, or termination. Anyone found engaging in or condoning discrimination or harassment in violation of the Work Environment Policy including managers and supervisors, and regardless of position or title, will be subject to discipline, up to and including termination.

We won't retaliate or otherwise hold complaints made in good faith against a team member who reports inappropriate conduct or participates in an investigation of such conduct. Remember, it is everyone's job to report discrimination and harassment and to cooperate in the company's investigation of such reports.

### A Message for Our Leaders

We have high expectations for our leaders and expect all leaders to manage the work environment in a way that discourages any form of discrimination, harassment, retaliation, threats or workplace violence.

Leaders are expected to:

- Monitor the workplace to identify harassing, discriminatory, retaliatory conduct, threats or workplace violence and
- Immediately take any appropriate action to prevent and promptly correct inappropriate behavior.

Remember, it is everyone's job to prevent and report discrimination, harassment, retaliation, threats or workplace violence and to cooperate in the company's investigation of such reports. Anyone found engaging in discrimination, harassment, retaliation, threats or workplace violence will be subject to discipline, up to and including termination.

### Federal and State Resources

Federal law and most U.S. states prohibit sexual harassment and illicit discrimination and retaliation. Local laws also may apply.

Examples of federal and state statutes are below.

Location	Law	Forums for adjudication of complaints
United States	Civil Rights Act of 1964, Title VII	Equal Employment Opportunity Commission ( <a href="http://www.eeoc.gov">www.eeoc.gov</a> or 1-800- 669-4000), United States District Courts, State courts
California	California Government Code § 12940	California Department of Fair Employment and Housing ( <a href="http://www.dfeh.ca.gov">www.dfeh.ca.gov</a> or 1-800- 884-1684), California Superior Court

<p>Illinois</p>	<p>775 ILCS 5/1 et seq</p>	<p>ILCIRA hopes that any incident of sexual harassment can be resolved through the internal process outlined above. However, in Illinois, team members have the right to file formal charges with the Illinois Department of Human Rights (“IDHR”) and/or the United States Equal Employment Opportunity Commission (“EEOC”). A charge with IDHR must be filed within 180 days of the incident of sexual harassment. A charge with EEOC must be filed within 300 days of the incident.</p> <p><b>ADMINISTRATIVE CONTACTS</b>          Illinois Department of Human Rights (IDH R)          Chicago: 312—814—6200 or 800—662—3942          Chicago TTY: 866-740-3953          Springfield: 217-785-5100          Springfield TTY: 866-740-3953          Marion: 618-993-7463          Marion TTY: 866-740-3953</p> <p>Illinois Human Rights Commission (IHRC)          Chicago: 312-814-6269          Chicago TTY: 312-814-4760          Springfield: 217-785-4350          Springfield TTY: 217-557-1500</p> <p>United States Equal Employment Opportunity Commission (EEOC)          Chicago: 800-669-4000          Chicago TTY: 800-869-8001</p>
<p>Maine</p>	<p>Me. Rev. Stat. title 5, § 4572</p>	<p>Legal Recourse - Maine Human Rights Commission          A team member who believes that he or she has been subjected to unlawful harassment may file a complaint with the Maine Human Rights Commission (MHRC) Commission.          The MH RC is the state agency that receives and investigates complaints of unlawful harassment and discrimination in employment, and may pursue a remedy in court when alternative resolutions, such as mediation, have failed  <b>MH RC Complaint Process</b>          A complaint of sexual harassment may be initiated by writing or visiting the office of the Maine Human Rights Commission at 51 State House Station, Augusta, Maine</p>

		<p>04333 or by calling 207-624-6290. An Electronic Intake Questionnaire may be completed and submitted online at <a href="http://www.maine.gov/mhrc">www.maine.gov/mhrc</a></p> <p>Retaliation is Prohibited</p> <p>The Maine Human Rights Act prohibits retaliation against any team member because of the filing a complaint with the MH RC, or participating in an investigation of harassment. This protection extends to any good-faith complaints, even if the investigation does not result in a finding of illegal harassment.</p> <p>Any team member who retaliates against another team member who complains about harassment will be disciplined, including and up to discharge.</p>
Massachusetts	Massachusetts General Laws Chapter 151B	<p>Sexual Harassment — Responsible Agencies</p> <p>The United States Equal Employment Opportunity Commission 1 Congress Street - 10th floor Boston, MA 02114 (800) 669-4000 <a href="http://www.eeoc.gov/field/boston/">http://www.eeoc.gov/field/boston/</a></p> <p>The Massachusetts Commission Against Discrimination</p> <p>Boston Office 1 Ash burton Place Suite 601 Boston, MA 02108 (617) 994-6000</p> <p>Worcester Office 484 Main Street Room 320 Worcester, MA 01608 (508) 453-9630</p> <p>Springfield Office 436 Dwight Street Room 220 Springfield, MA 01103 (413) 739-214S</p> <p>New Bedford Office 800 Purchase Street Room 501 New Bedford, MA 02740 (508) 990—2390 <a href="http://www.mass.gov/mcad/">http://www.mass.gov/mcad/</a></p>
New York	New York Labor Law § 201-g, New York Human Rights Law § 296.1	<p>New York Department of Human Rights (<a href="http://www.dhr.ny.gov">www.dhr.ny.gov</a> or 1-888-392-3644), New York Department of Labor (<a href="http://www.labor.ny.gov">www.labor.ny.gov</a> or 1-888-469-7365), <a href="#">NYC Stop Sexual Harassment Fact Sheet</a> <a href="#">NYC Stop Sexual Harassment Fact Sheet</a> (Spanish)</p>

		<p><u>NYC Stop Sexual Harassment Notice</u></p>
<p>Oregon</p>	<p>Oregon Workplace Fairness Act Oregon Statutes 659A.030. 659A.082. 659A 112</p>	<p>In addition to the provisions set forth in the Work Environment Policy, Oregon law has the following specific requirements applicable to Oregon team members:</p> <p><u>Additional Protected Categories:</u></p> <ul style="list-style-type: none"> <li>● expunged juvenile record</li> <li>● performance of duty in a uniformed service</li> </ul> <p><u>Documentation:</u></p> <p>All team members are encouraged to document any incidents involving discrimination, harassment, and sexual assault as soon as possible.</p> <p><u>Time Limitations:</u></p> <p>Note that Oregon state law requires that any legal action taken on alleged discriminatory conduct (specifically that prohibited by ORS 659A.030, 659A.082 or 659A 112) commence no later than five years after the occurrence of the violation. Other applicable laws may have a shorter time limitation on filing.</p> <p><u>Notice regarding Nondisclosure or Non-disparagement Agreements:</u></p> <p>The company will not require a team member to enter into any agreement if the purpose or effect of the agreement prevents the employee from disclosing or discussing conduct constituting discrimination, harassment, or sexual assault.</p> <p>A team member claiming to be aggrieved by discrimination, harassment, or sexual assault may, however, voluntarily request to enter into a settlement, separation, or severance agreement which contains a nondisclosure, non-disparagement, or no- rehire provision and will have at least seven days to revoke any such agreement.</p>



		<p>Under this provision, a nondisclosure agreement is any agreement by which one or more parties agree not to discuss or disclose information regarding any complaint of work-related harassment, discrimination, or sexual assault.</p> <p>A non-disparagement agreement is any agreement by which one or more parties agree not to discredit or make negative or disparaging written or oral statements about any other party or the company.</p> <p>A no-rehire provision is an agreement that prohibits an employee from seeking reemployment with the company and allows a company to not rehire that individual in the future.</p>
Rhode Island	Rhode Island General Laws § 28-5-1	<p>In addition to the complaint procedure set forth in this policy, team members who believe that they have been subjected to or witnessed sexual harassment may file a complaint by writing or calling any of the following state or federal agencies:</p> <p>Rhode Island Commission for Human Rights 180 Westminister Street, 3rd Floor Providence, RI 02903 401-222-2661</p> <p>U.S. Equal Employment Opportunity Commission 33 Whitehall Street, Sth Floor New York, NY 10004 800—669—4000</p> <p>Remedial Action</p> <p>ILCIRA will investigate promptly and thoroughly any complaint as it arises and will take appropriate action. Disciplinary action, up to and including termination of employment, will be taken against any team member engaging in any act in violation of this policy.</p>
Vermont	Vermont Statutes Title 21 § 495	Sexual harassment and harassment based on other protected characteristics, is unlawful in the workplace and will not be tolerated by ILCIRA. ILCIRA

		<p>prohibition on harassment in the workplace is set forth in this policy. If you witness such conduct, address it immediately, and make sure it stops.</p> <p>Team members should also be aware that the following agencies investigate and prosecute complaints of unlawful harassment in employment:</p> <p>State of Vermont Attorney General's Office Civil Rights Unit (FEPA) 109 State Street Montpelier, VT 05602 (888-745-9195 or 802-828-3665 voice/TDD)</p> <p>Equal Employment Opportunity Commission (EEOC) John F. Kennedy Federal Govt. Ctr., Room 475 Boston, MA 02203 (617-565-3200 or 1-800-669-4000)</p> <p>Team members who believe that they have been unlawfully harassed may file a complaint with the Attorney General's Office or the EEOC. These agencies serve as neutral fact finders and attempt to help the parties voluntarily resolve disputes.</p>
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