

Harassment Policy and Procedures

Source: World Learning Inc. Human Resources Policy Manual

World Learning desires to provide a work environment for employees and a learning environment for students and program participants that are free from harassment. Harassment of anyone, on the basis of race, color, religion, ancestry, national origin, sex, sexual orientation, age, disability, place of birth, military service, HIV-positive status, gender identity, genetic information, or any legally protected classification may be unlawful and is a violation of World Learning's policy.

All employees are entitled to a workplace free of discrimination, including harassment based on any of the above factors. We will not tolerate such conduct at the workplace. If an employee believes that he or she has been subjected to such discrimination or harassment, the reporting procedure outlined below should be followed.

211.1 Sexual Harassment Sexual harassment is a type of harassment that may include unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature, where 1. submission to such conduct is made either explicitly or implicitly a term or condition of employment; 2. submission to, or rejection of, such conduct by an individual is used as a basis for employment decisions affecting that individual; or 3. such conduct has the purpose or effect of substantially interfering with an individual's work performance, or creating an intimidating, offensive, or hostile working environment. • Examples of sexual harassment include, but are not limited to the following, when such acts or behavior involves one of the above criteria: ☐ touching or grabbing a sexual part of an individual's body; ☐ touching or grabbing any part of an individual's body after that person has indicated, or it is known or should be known, that such physical contact is unwelcome; ☐ continuing to ask an individual to socialize on- or off-duty when that person has indicated he or she is not interested; ☐ displaying or transmitting sexually suggestive images, pictures, objects, cartoons, or posters; ☐ writing sexually suggestive notes or letters; ☐ referring to or calling a person a sexualized name; ☐ regularly telling sexual jokes or using sexually vulgar or explicit language in the presence of a person; ☐ retaliation of any kind for having filed or supported a complaint of sexual harassment (that is, ostracizing the person, pressuring the person to drop or not support the complaint, adversely altering that person's duties or work or learning environment, and so forth); ☐ derogatory or provoking remarks about or relating to an individual's sex or sexual orientation; ☐ harassing acts or behavior directed

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against a person on the basis of his or her sex or sexual orientation; ☐off-duty conduct that falls within the above definition and affects the work or learning environment. 211.2Reporting HarassmentAn individual who believes he or she is a victim of harassment or has witnessed harassment should report it promptly to the director of Human Resources at 802 258-3111, office located at Boyce House, Kipling Road, Brattleboro VT 05301, or 1015 15th ST., NW, Washington, DC, 20005 or to the Senior Vice President of Legal Affairs at 802 258-3490, located in the Boyce House. Allegations of harassment will be investigated promptly. Confidentiality of the identity of the individual bringing the allegation will be maintained throughout the investigation to the extent possible and appropriate under the circumstances.

When the investigation is completed, the individual filing the complaint and the accused harasser will be informed of the outcome of the investigation. If an investigation shows that harassment has taken place, World Learning will take appropriate corrective action, including disciplinary action against the harasser, up to and including termination or dismissal.Frivolous, malicious, or false claims of harassment will not be tolerated and could result in disciplinary action up to and including termination. World Learning encourages all individuals to report harassment to World Learning according to the above reporting procedure. In addition, individuals may also file a complaint by writing to or calling any of the following state or federal agencies:For Vermont-based employees: Vermont Attorney General's Office, Civil Rights Unit, 109 State Street, Montpelier, VT 05609; 802 828-3171 (voice/TDD).For DC-based employees: District of Columbia Office of Human Rights, 441 4th Street, NW, Suite 570N, Washington, DC 20001; 202 727-4559. For Vermont- and DC-based employees: Equal Employment Opportunity Commission, 1 Congress Street, Boston, MA 02114; 617 565-3200 (voice), 617 565-3204 (TDD).211.2(a) Retaliation ProhibitedWorld Learning prohibits retaliation against anyone who files a good faith complaint of harassment or who assists in the investigation of a complaint of harassment.

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