CASA PROJECT INC.

NON-DISCRIMINATION POLICY

Last Revision Date: 1-19-22 **Approved by Board 1/19/22**

Signature: Lynn M. Barrieau **Date: 1/15/22**

Policy Owner (printed name): Lynn Barrieau

Objective

CASA Project Inc. of Worcester (CASA) is committed to a work environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment.

CASA has developed this policy to ensure that all employees can work in an environment free from unlawful harassment, discrimination, and retaliation. CASA will ensure that all employees understand this policy and are aware that any complaint in violation of this policy will be investigated and resolved promptly. Any employee who has questions or concerns about this policy should talk with the Executive Director or HR Coordinator. If the question or concern involves the Executive Director, then the inquiry should be made directly to the President of the Board of Directors.

Individuals and Conduct Covered

This policy applies to all applicants and employees, whether related to conduct engaged in by fellow employees or by someone not directly connected to the CASA (e.g., a board member, outside vendor, consultant, or customer).

Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

Equal employment opportunity

To assist CASA in its future development as an organization and to help us better serve our clients, the children, CASA is committed to providing equal opportunity within the CASA workforce. This tenet will be applied to all segments of the employment process and in all dealings with our employees. We will not discriminate against any employee or applicant on the basis of race, color, religion, creed, sex, sexual orientation, pregnancy, marital status, national origin, citizenship, ancestry, ethnic heritage, age, genetic information, physical or mental disability, history of disability or veteran status, or any other protected status as identified by applicable federal, state, or local law. The CASA work environment should stress CASA's belief in the individual dignity and worth of each employee.

Harassment

Harassment is strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of their race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, or that of their relatives, friends or associates, and that: a) has the purpose or effect of creating an intimidating, hostile or offensive work environment, b) has the purpose or effect of unreasonably interfering with an individual's work performance, or c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs, or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment by e-mail, phone (including voice messages), text messages, social networking sites or other means.

In accordance with Massachusetts law and Title VII of the 1964 Civil Rights Act, as amended, CASA recognizes the right of all employees to work in an environment in which individual dignity is respected and protected. Any employee who is found to have harassed another employee based on discriminatory criteria will be subject to disciplinary action, up to and including termination of employment. CASA also recognizes false accusations may have serious effects on innocent persons. Employees found to have made false accusations will be subject to disciplinary action, up to and including termination of employment.

Sexual harassment

Sexual harassment constitutes discrimination and is illegal under federal, state, and local laws. CASA is committed to eliminating sexual harassment from the workplace.

Sexual harassment refers to any type of behavior of a sexual nature that is intentional or unintentional, that is unwelcome and offensive, and that has the purpose of creating a work environment that is hostile, offensive, intimidating or humiliating. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when 1) making submission to or rejection of such conduct, whether requests or conduct is made, either explicitly or implicitly, the basis for employment decisions affecting the employee; 2) conduct that has the purpose or effect of interfering with work performance; 3) conduct has the purpose or effect of creating an intimidating, hostile, humiliating or offensive work environment by means of any behavior that is sexual in nature or has sexual overtones.

All employees are responsible for maintaining a workplace free of harassment.

Non-Retaliation

The purpose of this section of the policy is to prevent retaliation of any kind against a CASA employee for reporting in good faith a suspected violation of federal or state laws, CASA policies or the CASA Human Resource Manual.

CASA requires reporting of all perceived incidents of discrimination, harassment or violation of CASA policies and procedures. It is the policy of CASA to investigate such reports promptly and thoroughly. CASA prohibits threatening behavior, coercion, intimidation, discrimination, or retaliatory action against any individual who reports in good faith, or who participates in an investigation of such reports, of such suspected violations.

Reporting an Incident of Harassment, Discrimination or Retaliation

CASA requires reporting of all perceived incidents of discrimination, harassment, or retaliation, regardless of the offender's identity or position. Individuals who believe that they have been the victim of such conduct should discuss their concerns with their immediate supervisor, the HR Coordinator, or the Executive Director (issues concerning the Executive Director should be reported directly to the Board President). See the complaint procedure described below.

In addition, CASA encourages individuals who believe they are being subjected to such conduct, and who are comfortable in doing so, to promptly advise the offender that their behavior is unwelcome and to request that it be discontinued. Often this action alone will resolve the problem. CASA recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

Complaint Procedure

Individuals who believe they have been the victims of conduct prohibited by this policy or believe they have witnessed such conduct should discuss their concerns with their immediate supervisor, the HR Coordinator, or the Executive Director (if the incident involves the Executive Director, then the employee should report their concerns to the Board President).

CASA requires the prompt reporting of complaints or concerns so that rapid investigation and prompt action can be taken. Therefore, while no fixed reporting period has been established, early reporting and intervention are the most effective method of resolving incidents of harassment.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have another relevant knowledge. Employees are required to cooperate with investigations. CASA will use best efforts to maintain confidentiality throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Disciplinary action may include, for example, training, referral to counseling, verbal, or written warnings, withholding of a promotion or pay increase, reassignment, temporary suspension without pay, or termination, as CASA believes appropriate under the circumstances.

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