

EQUAL EMPLOYMENT OPPORTUNITY

Secret Harbour affirms its commitment to equal opportunity for all qualified persons, regardless of race, color, religion, sex, national origin, physical or mental disability, genetic information, or veteran status.

DISCRIMINATORY HARASSMENT AND SEXUAL HARASSMENT POLICY

Secret Harbour is committed to maintaining a work environment that is free from any form of discriminatory harassment. Discriminatory harassment consists of unwelcome conduct, whether verbal, physical or visual, that is:

- Based on an employee's gender, color, race, age, national origin, disability, religion, sexual orientation, or other legally protected status; and
- Interferes unreasonably with work performance; or creates an intimidating, hostile or offensive work environment.

Secret Harbour DOES NOT TOLERATE discriminatory harassment.

Sexual Harassment

Sexual harassment is one form of discriminatory harassment. Sexual harassment is unlawful. Unwelcome sexual advances, requests for sexual favors, or other conduct of a sexual nature constitute sexual harassment when:

- Submission to the conduct is made (implicitly or explicitly) as a term or condition of employment;
- Employment decisions affecting an individual are based upon the individual's submission to or rejection of such conduct; or
- The conduct has the purpose or effect of unreasonably interfering with the individual's work performance or creating an intimidating, hostile, or offensive work environment.

The following list offers some examples of conduct that may be regarded as sexual harassment:

- Physical contact, such as hugging, kissing, grabbing, pinching, patting, brushing against, touching or blocking one's path or exit;
- Implicit or explicit sexual propositions, requests, demands, or other forms of pressure for sexual favors;
- Sexual suggestive or degrading remarks, including sexual innuendos, jokes, kidding or teasing;

- Verbal or physical flirtation, sexual gestures or sexual comments about another person's body;
- Vulgar or obscene language; and
- Display of sexually explicit or offensive printed or visual material, including but not limited to photographs, cartoons, drawings or notes.

Reporting Discrimination or Discriminatory Harassment

If you believe that you have experienced discrimination, or discriminatory harassment (including sexual harassment) or have been refused a reasonable accommodation, you should report such immediately to your supervisor, General Manager, or the Board.

All reports of discrimination or discriminatory harassment will be investigated fully, promptly and, to the extent reasonably possible, on a confidential basis. All reports of discrimination or discriminatory harassment will be handled in accordance with the grievance procedure provided herein, to the extent possible.

Corrective Action

Any employee who is determined to have engaged in discriminatory conduct, including discriminatory harassment, will be subject to disciplinary action, up to and including discharge. In the event of discriminatory conduct or sexual harassment by a non-employee, Secret Harbour will take the corrective actions appropriate under the circumstances.

Employee Responsibilities

All employees have a personal responsibility to conduct themselves in compliance with this policy and to report to a member of management any instances of discriminatory conduct, including sexual harassment or other discriminatory harassment.

Retaliation

No employee shall be subject to retaliation for reporting or expressing opposition to any incident of unlawful discrimination or discriminatory harassment; or for cooperating, assisting or otherwise participating in the investigation of any report of unlawful discrimination or discriminatory harassment, or for requesting a reasonable accommodation to his/her disability or religious beliefs, practices, or observations. If you believe that you have been subject to retaliation, you should report the conduct immediately to your supervisor, General Manager or the Board.