



Sexual Harassment Policy

FDR Memorial Legacy Committee Sexual Harassment Policy

Policy Brief and Purpose:

The FDR Memorial Legacy Committee (FDR Committee) sexual harassment policy aims to safeguard employees of all sexes and gender identities in our company from unwanted sexual advances, and provide them with guidelines to report incidents. It also explains how we handle complaints, take action against offenders, and help survivors to recover.

We will not accept sexual harassment in our workplace.

Scope:

This policy applies to all FDR Committee employees.

FDR Committee will not tolerate sexual harassment from outside the company either. Customers, investors, contractors, and everyone interacting with our company are covered by this policy. Details of how we deal with harassment from outside our company is outlined in our third party harassment policy.

Policy Statement:

Sexual harassment definition:

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

This was created by the FDR Memorial Legacy Committee.



- The offensive behavior creates an intimidating, abusive, or hostile work environment, or interferes with work performance.
- An employment decision regarding an employee is made because of their response to the offensive behavior (quid pro quo harassment).

Anybody can be a victim of sexual harassment, regardless of their sex or gender identity and that of the offending party.

Sexual harassment can involve one or more incidents that may be physical, verbal, or non-verbal, and includes:

- Commenting on somebody's appearance, sexual orientation, or gender in a derogatory or objectifying way, or in a way that makes them uncomfortable.
- Creating or posting sexually offensive materials in the workplace.
- Flirting at an inappropriate time, for instance in a team meeting, even if these advances would have been welcome in a different setting. These actions can damage a person's professional reputation, and expose them to further sexual harassment.
- Flirting with somebody or pursuing them persistently against their will.
- Using obscene comments, gestures, pranks, and jokes that degrade or offend somebody.
- Sending or displaying sexually explicit objects or messages.
- Invading somebody's personal space, for example by touching them inappropriately.
- Threatening, coercing, stalking, or intimidating somebody to pressure them to engage in sexual acts.
- Proposing, demanding, or insinuating sexual favors.
- Sexual assault.

Reporting Process:

If you believe that you are the target of sexual harassment, inform the offending party (except in cases of sexual assault) verbally or in writing that their conduct is offensive and needs to stop.

If you don't want to communicate with the offending party, or if your communication is ineffective, you need to report them.

Complaints can be lodged in writing with Mary Dolan via email mary@fdrmemoriallegacy.com. Your complaint will be documented and resolved within 30 business days. Complaints will be treated as confidential.

Both FDR Committee and federal law prohibit any form of retaliation against somebody claiming sexual harassment.



Investigation Process:

FDR Committee will:

- Record the dates, times, and circumstances of the incident.
- Ensure that the complainant understands FDR Committee procedures for dealing with the complaint.
- Determine what outcome the complainant wants.
- Investigate the matter.

Based on the above, FDR Committee will further:

- Contact the offending party and set up a meeting to explain the complaint, and to ask them to stop this behavior.
- If the complainant agrees, arrange for mediation sessions with the complainant and the alleged perpetrator to resolve the issue.

Penalties for Sexual Harassment:

Employees who are found guilty of sexual harassment (excluding sexual assault, for which they will be dismissed) the first time may:

- Be demoted.
- Receive a written warning.
- Be suspended.
- Get a negative performance review.
- Be denied promotions and/or salary increases for [period].
- Be transferred to another department or branch if necessary.

We will dismiss repeat offenders after a second offense.

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