

## **Anti-Harassment and Discrimination Policy** **(last updated 10/23/26)**

Pursuant to federal, state and local laws, the Organization is committed to maintaining a working environment that is free from discrimination, intimidation, and harassment. Harassment and discrimination based on a characteristic protected by state, federal, or local law, such as race, color, ancestry, national origin, gender, sex, sexual orientation, gender identity, marital status, religion, age, disability, veteran status, or other characteristics is unlawful and prohibited.

Harassment of our employees by management, supervisors, coworkers, or non-employees who are in the workplace is prohibited. Furthermore, any retaliation against an employee who has complained about sexual or other harassment or retaliation against an employee for cooperating with an investigation of a harassment complaint is similarly unlawful and will not be tolerated. PVA-WI will take all steps necessary to prevent and eliminate unlawful harassment.

Unlawful harassment is conduct that has the purpose or effect of creating an intimidating, hostile, or offensive work environment; has the purpose or effect of substantially and unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment opportunities because of the individual's membership in a protected class. [These are also elements of discrimination.]

Unlawful harassment includes, but is not limited to, epithets; slurs; jokes; pranks; innuendo; comments; written or graphic material; stereotyping; or other threatening, hostile, or intimidating acts based on race, color, ancestry, national origin, gender, sex, sexual orientation, marital status, religion, age, disability, veteran status, or and other characteristics protected by state, federal, and local laws.

Sexual harassment is a particular form of discrimination that violates both the law and PVA-WI policy.

Sexual harassment is generally defined under both state and federal law as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature where:

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

Other sexually oriented conduct, whether intended or not, that is unwelcome and has the effect of creating a work environment that is hostile, offensive, intimidating, or humiliating to workers may also constitute as sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct that may constitute sexual harassment depending on the totality of the circumstances, including the severity of the conduct and the conduct's pervasiveness: [Even if not unwelcome, if the conduct offends someone else (e.g., a witness), then the conduct can be considered sexual harassment.]

- Unwanted sexual advances, whether they involve physical touching or not;
- Requests for sexual favors in exchange for actual or promised job benefits, financial aid or other benefits such as favorable reviews, salary increases, promotions, increased benefits, continued employment, or tuition/academic support;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life, comments about an individual's body, comments about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, or cartoons;
- Unwelcome leering, whistling, brushing up against the body, sexual gestures, or suggestive or insulting comments;
- Inquiries into one's sexual experiences; and
- Discussion of one's sexual activities;
- Assault or coerced sexual acts;
- Gratuitous comments about someone's personal appearance implying the commenter's personal attraction to the recipient (e.g., I think you are beautiful).

Any employee who believes they have been subject to or witnessed illegal discrimination, including sexual or other forms of unlawful harassment, are requested and encouraged to make a report. The employee may, but is not required to, report first to the person they feel is discriminating against or harassing them. The employee may report the concern directly to the immediate supervisor, the Board President or a member of Executive Committee to whom the employee feels comfortable bringing such a complaint to. Similarly, if any employee observes acts of discrimination toward or harassment of another employee, the Organization vehemently encourages the employee to report this to their direct supervisor.

Supervisors are required to report observed incidences of harassment or discrimination to the Board President or a member of Executive Committee (if the complaint directly involves the Board President).

No reprisal, retaliation, or other adverse action will be taken against an employee for reporting a complaint or report of discrimination or harassment, or for assisting in the investigation of any such complaint or report. Any suspected retaliation or intimidation should be reported immediately to one of the persons identified above.

All complaints will be investigated promptly and, to the greatest extent possible, with regard for confidentiality.

If the investigation confirms that harassment or discrimination has occurred, the Organization will take immediate and appropriate action, up to and including immediate termination or legal action.