

Brewster Whitecaps

Harassment-free Operations Policy

The Brewster Whitecaps organization is committed to operating in all aspects of its activities in a manner free of all forms of harassment, including sexual harassment. It is our policy to regard any unlawful harassment of employees, interns, volunteers, or applicants for such positions as a very serious matter. Unlawful harassment of any kind, including sexual harassment, by any person is strictly prohibited.

DEFINITIONS

- A. Harassment includes any conduct that is severe or pervasive and has the purpose or effect of unreasonably interfering with an individual's performance or creating an intimidating, hostile, or abusive environment.
- B. "Unlawful Sexual harassment" includes: unwelcomed sexual advances, requests for sexual favors, and 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 an individual's continued association with the team, or
 - 2. submission to or rejection of such conduct by an individual is used as a basis for decisions affecting such individual, or
 - 3. such conduct rises to the level described in A, above.
- C. Conduct which falls within the definition of unlawful sexual harassment may include, but is not limited to:
 - 1. Unwelcomed physical contact of a sexual nature such as patting, pinching or unnecessary touching.
 - 2. Overt or implied threats against an individual to induce him or her to perform sexual favors or engage in unwelcomed sexual relationships.
 - 3. Verbal harassment or abuse of a sexual nature, including intimating by way of suggestion a desire for sexual relations or the making of jokes or remarks of a sexual nature to or in the presence of an individual who finds them offensive.
 - 4. Use of sexually suggestive terms or gestures to describe an individual's body, clothing or sexual activities.
 - 5. Displaying, printing, or transmitting offensive sexually suggestive pictures or materials.
- D. This policy shall be conspicuously posted for viewing by applicants, employees, interns and volunteers.

COMPLAINT PROCEDURE

- A. Any employee, intern, volunteer, or applicant for such positions who believes that he/she has been subjected to any form of unlawful harassment by an individual associated with the Whitecaps is expected and has a responsibility to report the matter. Any complaints of unlawful harassment should be made to the President, or other appropriate official of the club. An employee or applicant need not contact anyone that the employee or applicant believes to be an involved party. All complaints of unlawful

harassment should be made within 60 days of the alleged harassment.

- B. The President or other official, as the case may be, shall immediately record any complaint, indicating the date, persons involved, and a brief statement of the complaint. The complainant shall sign the complaint form, amending it if necessary. A copy of the complaint shall be provided to the alleged offender. All complaints shall be confidential to the extent possible.
- C. An appropriate investigation shall be conducted by the President or designee within two calendar weeks of the complaint. If the complaint is unsubstantiated, the complainant shall have the right to appeal the decision to the Board of Directors.
- D. If there is sufficient basis for the complaint, the President or designee shall take appropriate remedial action, including but not limited to suspension or termination of the alleged offender's relationship with the Whitecaps. Either the complainant or the alleged offender may appeal the remedial action to the Board of Directors.
- E. The Whitecaps encourage and expect applicants, employees, interns and volunteers to immediately report any incidents of perceived unlawful harassment and to cooperate with any investigation of a complaint of unlawful harassment. The Whitecaps strictly prohibit any retaliation against any complainant for filing a complaint of perceived unlawful harassment or participating in the investigation of such complaint.

EQUAL OPPORTUNITY

It is the policy of the Brewster Whitecaps to provide equal opportunity to all employees, applicants, interns and volunteers without regard to race, creed, color, sex, religion, national origin, citizenship, age, veteran status, disability, pregnancy, marital status, sexual orientation or gender identification. This policy relates to all employment decisions, and the selection and assignment of volunteers and interns. All of our policies and practices are in accordance with federal, state and local equal opportunity principles and other related laws.

The **Club** will not tolerate any conduct calculated to intimidate, harass, or otherwise discriminate against employees, interns, volunteers, or candidates for such positions on the grounds listed above. Anyone who feels that his or her rights have been violated under this policy should inform an appropriate team official.