



## **RETALIATION POLICY**

We will not retaliate against any person for having reported or threatened to report harassment, discrimination, retaliation, or violations of our Code of Conduct or policies, or for participating in an investigation into any of the foregoing.

Anyone who retaliates against a person will be subjected to disciplinary action, up to and including termination. We encourage any person — including employees, non-employees, and students — who believe they have been subject to retaliation to inform a supervisor or manager.

We have a zero-tolerance policy for sexual harassment or sexual misconduct. We encourage anyone who has been anyone who is subject to this behavior to report it to the human resources department or school management. We will do everything possible to ensure that you are not retaliated against by anyone because you have reported misconduct.

### **What Is Retaliation?**

Retaliation means taking an “adverse action” against any person for having reported or threatened to report harassment, discrimination, retaliation, or violations of our Code of Conduct, or for participating in an investigation into a complaint of harassment, discrimination, or retaliation or violations of our Code of Conduct.

In the case of employees, retaliation is an adverse employment action taken against an individual for having reported or threatened to report harassment, discrimination, or retaliation, or for participating in an investigation into a complaint of harassment, discrimination, or retaliation. Retaliation may include any acts that are “materially adverse” to a reasonable employee, regardless of whether those acts result in a loss of

pay, benefits, or any other privileges of employment, or not. For an action to qualify as retaliation, an employee or supervisor's actions must be harmful to the point that they may dissuade a reasonable worker from making a charge of discrimination. Some examples of adverse actions are denial of promotion, refusal to hire, denial of job benefits, demotion, suspension, and discharge. Other types of adverse actions include threats, reprimands, negative evaluations, harassment, or other adverse treatment.

## Reporting Sexual Harassment and Sexual Misconduct

We have a zero-tolerance policy for sexual harassment or sexual misconduct. We encourage anyone who has been anyone who is subject to or school management. We need to know what's going on so we can act on it. We will do everything possible to stop sexual harassment and sexual misconduct from happening. We will not permit anyone to retaliate against you for filing a report of sexual misconduct.

## Responsibility of Managers

Managers have a responsibility to create, uphold, and promote a safe, respectful, and inclusive work environment. Like all employees, managers are required to comply with our Code of Conduct. Managers may be subject to disciplinary action if they engage in, ignore, or in any way condone, conduct that violates our Code of Conduct.

Managers are required to promptly report any violation of our non-retaliation policy to the human resources department or school management. Promptness is key and managers should report as soon as possible upon learning of a violation. The failure by a manager to report in a timely fashion or at all, may result in discipline up to and including termination.

Managers shall not, under any circumstances, retaliate against anyone, blame the victim, conceal a report, or discourage employees from reporting sexual harassment or violations of our Code of Conduct. If you believe a manager has behaved in that way, please report it to the Human Resources Department or school management.