

**JEWISH UNITED FUND / JEWISH FEDERATION /
FACILITIES CORPORATION**

ANTI-HARASSMENT POLICY

The purpose of this policy is to explain the specific policies of the Jewish United Fund / Jewish Federation / Facilities Corporation (hereafter referred to as JUF) condemning sexual harassment and any other harassment of any individual based on that person's race, color, religion, sex, national origin, creed, citizenship, age, ancestry, marital status, disability, sexual orientation, gender identity, unfavorable military discharge and/or other legally protected status and JUF's procedures for preventing such harassment and for taking prompt and effective corrective action to remedy any situation involving actual or apparent harassment should such a situation occur.

Policy Statement

JUF does not approve of and will not condone any harassment or sexual harassment of any employee by a co-worker, supervisor, manager, intern, donor, lay leader, volunteer, client, guest or individual employed by or associated with firms or other entities that do business with JUF or with whom you come in contact during the course of your employment. JUF's policy toward harassment and sexual harassment is one of "zero tolerance." All situations involving actual or apparent harassment or sexual harassment will be dealt with promptly and effectively. Any person who is found to have engaged in harassment or sexual harassment will be subject to appropriate discipline or other sanctions.

Harassment Defined/Explained

Harassment generally means any physical or verbal conduct that JUF determines to denigrate or show aversion toward an individual because of that person's race, color, religion, sex, national origin, creed, citizenship, age, ancestry, marital status, disability, sexual orientation, gender identity, unfavorable military discharge and/or other legally protected status, or toward the person's relatives, friends or associates when JUF concludes that the conduct (i) has the purpose or effect of creating an intimidating, hostile or offensive working environment; or (ii) has the purpose or effect of substantially interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities, without regard to whether the conduct would constitute actionable harassment under any law.

Harassment includes, but is not limited to, such things as physical or mental abuse, racial or ethnic insults or slurs, derogatory racial or ethnic jokes, taunting, or sabotage of an employee's work.

Sexual Harassment Defined/Explained

Sexual harassment generally means conduct which JUF determines to involve making unwelcome sexual advances, requesting sexual favors or engaging in other verbal or physical conduct of a sexual nature with a member of the same or opposite sex when JUF concludes that (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; or (ii) submission to or rejection of such conduct by an individual is used as the basis

for any employment decision affecting such individual; or (iii) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment, without regard to whether the conduct would constitute actionable sexual harassment under any law.

Sexual harassment can result from a single incident or from a pattern of behavior which has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. Sexual harassment may arise from verbal statements, physical actions, or both, directed at or in the presence of any employee. Examples of verbal sexual harassment include requests for sexual acts or favors, stating or implying that an individual's employment will be effected depending on the individual's response to a request for sexual favors or for establishing or continuing a sexual relationship, sexually vulgar language, dirty jokes, remarks about an individual's anatomy or sexual attributes, comments about a person's sexuality, sexual experiences or sexual matters, sexual noises, derogatory comments about gender, and repeated unwelcome requests for dates. Examples of physical sexual harassment include touching an individual in a sexual or other inappropriate manner or invading the individual's personal privacy, sexual gestures, staring at a person's body even if he or she appears not to notice, and unwarranted touching such as pinching, patting, fondling, grabbing, brushing against or poking, particularly intentionally touching an individual's breasts, buttocks, or genital area, or threats to take such actions. Sexual harassment may also arise from distributing, displaying or sending written, graphic or electronic sexual material or displaying sexually oriented magazines, posters, and photographs. Sexual harassment may arise where the offender's words or conduct create a hostile environment, regardless of whether directed to a member of the same or opposite sex, and regardless of whether the offender is sexually attracted to the victim.

This policy applies to all employees, including supervisors, managers and interns, and prohibits harassment and sexual harassment whether by employees, supervisors, managers, interns, donors, lay leaders, volunteers, clients, guests or individuals employed by or associated with firms or other entities that do business with JUF or with whom you come in contact during the course of your employment.

Reporting Procedures

The specific procedures for reporting any incident of alleged harassment or alleged sexual harassment are as follows:

- Any employee who feels that he or she has been harassed or sexually harassed should contact the head of the Human Resources Department. If the employee feels uncomfortable registering the complaint with the head of Human Resources, the employee should promptly contact JUF's chief executive officer, other executive officer, the employee's supervisor, or any other supervisor or manager with whom the employee feels comfortable. This initial report can be oral or written. If the complaint is against a client or a person with another organization or firm that does business with JUF, the complaint will be referred to the head of Human Resources who will select the most appropriate means of investigating the complaint and of protecting the employee against future actual or apparent harassment (sexual or otherwise).

- Before JUF begins an investigation of any complaint made under this policy, the head of Human Resources and/or the officer, supervisor or manager to whom the complaint was made will confer with the employee who made the complaint about any concerns expressed by the employee regarding the investigation.
- When a complaint is investigated, the alleged offender will be informed of the basis of the complaint, and that he or she has time to respond to the complaint in writing.
- The head of Human Resources or other investigator designated by JUF, after conducting a review of the facts of the investigation, including possible interviews with all parties and witnesses involved, will take appropriate and effective action, if any, based on the outcome of the investigation. Both parties will be notified of the decision. JUF's decision and the action it takes, if any, will be based on its investigation under this policy. Since JUF is not a court, its decisions under this policy and any actions it takes based on those decisions are not statements or opinions as to whether any conduct it finds to have violated this policy constitutes or does not constitute a violation of any law.
- Any incident of alleged harassment or sexual harassment should be reported promptly since failure to promptly report an occurrence of harassment or sexual harassment may hinder the investigation.
- If the alleged offender fails to respond to the complaint promptly, as requested, the complaint may be regarded as true, and the appropriate disciplinary measures may be taken as warranted.

It is the responsibility of every supervisor, manager and executive staff member of JUF who receives a report of harassment or sexual harassment, whether oral or written, formal or informal, or who becomes aware of any harassment or sexual harassment, to follow this policy so that all allegations of harassment or sexual harassment are reported promptly, are investigated promptly, and appropriate remedial action, if required, is taken promptly. Failure to follow this policy will result in discipline, up to and including discharge.

Confidentiality and Non-Retaliation

JUF not only prohibits harassment and sexual harassment, but also strictly prohibits any retaliation against any employee who, in good faith, reports harassment or sexual harassment or participates in an investigation of such reports. All reports of harassment or sexual harassment will be promptly handled, with attempts made to keep confidential the identity of the reporting party and the alleged offender on a need-to-know basis. Any supervisor, agent or other employee of JUF who retaliates against any employee for reporting harassment or sexual harassment or participating in an investigation of harassment or sexual harassment will be subject to appropriate discipline, up to and including discharge.

If an employee believes he or she has been retaliated against for exercising his or her rights under this policy, the employee should report such conduct using the complaint procedure set forth in this policy. There will be no retaliation against an employee who, in good faith, makes a complaint

of harassment, even if a complaint made in good faith turns out to be unfounded. However, because false accusations may have serious impact on the person accused, false accusations, made without a good faith reasonable belief in their truth, may result in disciplinary action, up to and including discharge.

We trust that all employees of JUF will continue to act responsibly to establish a pleasant working environment free of discrimination and harassment. JUF encourages any employee to raise questions he or she may have regarding this policy with the head of Human Resources, JUF's chief executive officer, the employee's supervisor, or any other supervisor, manager or member of the executive staff.