

# Policies Concerning Discrimination, Harassment and Retaliation Prevention

The provisions below come from the Association's Employee Handbook, issued December 2021, and are reprinted here so as to provide an explanation of the Association's policies with respect to these matters.

# **Equal Employment Opportunity**

The Association is committed to diversity, equity and inclusion in the workplace and does not discriminate on the basis of actual or perceived race, color, creed, religion, national origin, age, sex or gender (including pregnancy, childbirth and related medical conditions), sexual orientation, gender expression or gender identity (including transgender status), protected medical conditions as defined by applicable law, genetic information, national origin, ancestry, citizenship status, physical or mental disability, military service and veteran status, or any other characteristic protected by federal, state or local laws.

The Association extends the Equal Employment Opportunity policy to all phases of the employment process, including but not limited to: recruitment, advertising, selection; placement, transfer, demotion, training and development, position elimination, restructuring, promotion, compensation, benefits, layoffs, termination, access to facilities and programs, general treatment during employment, employee activities and all other conditions and benefits of employment.

Employees with questions or concerns about equal employment opportunities in the workplace should contact a member of management or Human Resources.

- A prompt investigation will be conducted.
- As warranted, the Association will take appropriate action.

The Association will endeavor to make a reasonable accommodation to the known physical or mental limitations of qualified employees with disabilities, without regard to any protected classifications, unless the accommodation would impose an undue hardship on the operation of our business.

If you are a person who needs assistance to perform your job duties because of a physical or mental condition, you should:

• Contact the Human Resources Department to submit a request.



- Complete a Reasonable Accommodation Request Form, which can be provided to you by the Human Resources Department when you open your request.
- Submit your Reasonable Accommodation Request Form and any supporting documentation to the Human Resources Department.
- Once you open your request and/or submit your Reasonable Accommodation Request Form, the Human Resources Department will contact you to discuss your request for reasonable accommodation.

If you have any questions about reasonable accommodations, please contact the Human Resources Department.

Employees may elect to use, according to the various policy criteria, PTO, holidays, or personal leave to accommodate their religious observance obligations. Whenever an employee encounters conflicts between their sincerely held religious beliefs and practices and their work schedule, task assignment, dress code, or other work-related matter, the employee should immediately contact either the Human Resources Department or supervisor to discuss possible religious accommodations.

The Association will not tolerate retaliation against any applicant or employee for initiating or cooperating in an investigation into a complaint of perceived discrimination made in good faith. To ensure our workplace is free of artificial barriers, violation of this policy may result in disciplinary action, up to and including termination.

## Discrimination, Harassment and Retaliation Prevention

The Alzheimer's Association does not tolerate and prohibits discrimination or harassment of or against our job applicants, contractors, interns, volunteers, or employees by another employee, supervisor, vendor, customer, or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or gender expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, protected medical condition as defined by applicable state or local law, genetic information, or any other characteristic protected by applicable federal, state, or local laws and ordinances (referred to as "protected characteristics"). The Association also prohibits retaliation as defined below.

The Association is committed to a workplace free of discrimination, harassment and retaliation. These behaviors are unacceptable in the workplace and in any work-related settings such as



business trips and Association sponsored social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party. In addition to being a violation of this policy, discrimination, harassment or retaliation based on any protected characteristic as defined by applicable federal, state, or local laws and ordinances also is unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment as defined by applicable federal, state, or local laws and ordinances are unlawful.

#### **Discrimination Defined**

Discrimination under this policy generally means treating differently or denying or granting a benefit to an individual because of the individual's actual or perceived protected characteristic.

#### **Harassment Defined**

Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of any actual or perceived protected characteristic or has the purpose or effect of unreasonably interfering with an individual's work performance creating an intimidating, hostile or offensive working environment.

Harassment can be verbal (including epithets, slurs, jokes, insults, gestures or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state, or local laws and ordinances. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

#### **Sexual Harassment Defined**

Sexual harassment can include all of the above actions, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal, visual or physical conduct of a sexual nature when:

- submission to that conduct or those advances or requests is made either explicitly or implicitly a term or condition of an individual's employment; or
- submission to or rejection of such conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or



• the conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

### **Policy Violations**

Examples of conduct that violates this policy include:

- unwelcome flirtations, leering, whistling, touching, pinching, assault, blocking normal movement
- requests for sexual favors or demands for sexual favors in exchange for favorable treatment · obscene or vulgar gestures, posters, or comments
- sexual jokes or comments about a person's body, sexual prowess, or sexual deficiencies propositions, or suggestive or insulting comments of a sexual nature
- derogatory cartoons, posters, and drawings
- sexually-explicit e-mails or voicemails
- uninvited touching of a sexual nature
- unwelcome sexually-related comments
- conversation about one's own or someone else's sex life
- conduct or comments consistently targeted at only one gender, even if the content is not sexual
- teasing or other conduct directed toward a person because of the person's gender

#### **Retaliation Defined**

Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. "Adverse conduct" includes but is not limited to: any action that would discourage or keep an individual from reporting discrimination, harassment or retaliation; shunning and avoiding an individual who reports discrimination, harassment or retaliation; express or implied threats or intimidation intended to prevent an individual from reporting discrimination, harassment or retaliation; and denying employment benefits because an applicant or employee reported discrimination, harassment or retaliation or participated in the reporting and investigation process described below.

## **Reporting Procedures**

The following steps have been put into place to ensure the work environment at the Association is respectful, professional, and free of discrimination, harassment and retaliation. If an employee believes someone has violated this policy or our Equal Employment Opportunity Policy, the employee should promptly bring the matter to the immediate attention of your supervisor,



Human Resources at the Home Office (312) 335-8700 or our confidential compliance line at (844) 905.2961 or <u>alz.ethicspoint.com</u>. If any of these individuals is the person toward whom the complaint is directed you should contact any higher level manager in your reporting chain. If the employee makes a complaint under this policy and has not received an initial response within five (5) business days, the employee should contact the Vice President of Human Resources at (312) 335-8700 immediately.

Every supervisor who learns of any employee's concern about conduct in violation of this policy or our Equal Employment Opportunity Policy, whether in a formal complaint or informally, or who otherwise is aware of conduct in violation of this policy, must immediately report the issues raised or conduct to the Vice President of Human Resources or to any Chief Officer who is a member of the Executive team).

## **Investigation Procedures**

Upon receiving a complaint, the Association will promptly conduct a fair and thorough investigation into the facts and circumstances of any claim of a violation of this policy or our Equal Employment Opportunity policy to ensure due process for all parties. To the extent possible, the Association will endeavor to keep the reporting employee's concerns confidential. However, complete confidentiality may not be possible in all circumstances. Employees are required to cooperate in all investigations conducted pursuant to this policy.

During the investigation, the Association generally will interview the complainant and the accused, conduct further interviews as necessary and review any relevant documents or other information. Upon completion of the investigation, the Association will determine whether this policy or our Equal Employment Opportunity policy has been violated based upon its reasonable evaluation of the information gathered during the investigation. The Association will inform the complainant and the accused of the results of the investigation.

The Association will take corrective measures against any person who it finds to have engaged in conduct in violation of this policy, if the Association determines such measures are necessary. These measures may include, but are not limited to, counseling, suspension, or immediate termination. Anyone, regardless of position or title, whom the Association determines has engaged in conduct that violates this policy or our Equal Employment Opportunity policy will be subject to discipline, up to and including termination. This includes individuals engaging in discrimination, harassment or retaliation, as well as supervisors who fail to report violations of this policy, or knowingly allow prohibited conduct to continue. Individuals who engage in conduct that rises to the level of a violation of law can be held personally liable for such conduct.



Remember, we cannot remedy claimed discrimination, harassment or retaliation unless you bring these claims to the attention of management. Please report any conduct which you believe violates this policy or our Equal Employment Opportunity policy.

Our Commitment to Transparency: The Alzheimer's Association<sup>®</sup> is dedicated to the transparent sharing of financial information, as well as information about our partnerships with companies, organizations and individuals. Learn more at alz.org/transparency.

The Policies in this document are reviewed annually.