

LEGAL COMPLIANCE

The Parks Conservancy complies with the following requirements as they pertain to its EEO policy: (1) Legally required notices will be openly displayed to ensure employee awareness of EEO policies; and (2) Our personnel actions at all facilities will conform to this policy and to federal, state, and local statutes regarding fair employment practices.

Violations of the EEO policy may constitute grounds for discipline, up to and including termination of employment for cause. It is the responsibility of every employee to conscientiously follow the EEO policy. Management at all levels is responsible for identifying conduct that conflicts with the EEO policy and resolving such issues in a manner consistent with the Parks Conservancy's objectives.

Employees who believe they have been subjected to any kind of treatment that conflicts with the Company's EEO policy, including discrimination or harassment, should seek assistance from a supervisor or a HR representative.

If you have any questions regarding this policy, please feel free to discuss them with the HR Department.

ANTI-HARASSMENT POLICY

In conjunction with the EEO policy, the Parks Conservancy is also committed to fostering a professional and comfortable workplace free of harassment, especially where harassment is based on age, ancestry, color, marital status, medical condition, mental disability, physical disability, national origin, race, religion, sex, sexual orientation, or any other classification protected by law.

This prohibition on harassment applies not only to the workplace, but also to all employment-related settings including business trips, business-related social events, and recreational and entertainment activities. It applies to all persons doing business with us such as clients, customers, vendors, and contractors. Supervisors are responsible for ensuring that their employees are neither the cause nor the object of harassment in the workplace.

HARASSMENT DEFINED

Harassment is any unwelcome verbal, visual, or physical conduct of a sexual, gender-based, racial, or other legally forbidden nature that may create an intimidating, offensive, hostile work environment or interfere with work performance. This conduct constitutes workplace harassment when:

- Submission to the conduct is made either an explicit or implicit condition of employment;
- Submission to or rejection of the conduct is used as the basis for an employment decision; or
- The harassment interferes with an employee's work performance or creates an intimidating, hostile, or offensive work environment.

EXAMPLES OF HARASSING CONDUCT

Harassing conduct can take many forms. It includes slurs, jokes, statements, gestures, pictures or cartoons, physical touching, threats, and adverse job actions. Sexual harassment may consist of unwelcome conduct such as:

- Threats or demands to submit to sexual requests in order to obtain or retain any employment benefit;
- Verbal conduct such as sexual jokes, sexual invitations or propositions, epithets, derogatory or obscene comments, slurs, or other verbal abuse of a sexual nature;
- Verbal commentary about an individual's body, sexual prowess, or sexual deficiencies;
- Suggestive, insulting, and/or obscene gestures;
- Flirtations, advances, leering, whistling, touching, pinching, assault, coerced sexual acts, or blocking normal movements;
- Visual conduct such as displays of derogatory or sexual posters, photographs, cartoons, drawings, gestures, or other sexually suggestive objects or pictures in the workplace;
- Negative conduct or comments targeted at one's gender or sexual orientation, even if the content is not sexual; or
- Adverse action or retaliation against someone who reports or threatens to report sexual harassment or objects to it.

REPORTING HARASSMENT AND THE INVESTIGATION PROCESS

If you believe that you or another person have been harassed by either an employee or non-employee, please promptly report the incident verbally or in writing to your supervisor or department manager. Prompt reporting is essential so that we can investigate the behavior as soon as possible.

If you do not feel comfortable discussing this issue with your own supervisor or department manager, or if your complaint involves such personnel, you can talk to another manager or to your Division Vice President, per the Open Door Policy discussed in the next section, Dispute Resolution Procedures. In addition, you can file a written complaint with the HR Department. Please refer to the section titled "Dispute Resolution Procedures" for more details.

We always want to hear your concerns and want you to feel comfortable and safe reporting them. We do not retaliate against anyone who reports harassing conduct in good faith or who cooperates in an investigation.

Every complaint of harassment will be investigated promptly and thoroughly. All employees are expected to cooperate in such investigations and to be honest and forthcoming with pertinent information.

DISCIPLINE

We are committed to preventing, investigating, and when appropriate, taking disciplinary and other action in response to harassment and related inappropriate conduct, regardless of whether the harassment is sufficiently severe or pervasive to be a violation of law. Any employee who engages in or condones harassment is subject to disciplinary action up to, and including, immediate termination.

DISPUTE RESOLUTION PROCEDURES

We value your opinions. We want to hear your concerns, complaints, and suggestions and want you to feel safe and encouraged to express them.

OPEN DOOR POLICY

If you have work-related concerns or complaints, we strongly encourage you to discuss them promptly and directly with your immediate supervisor or manager first. If you are not comfortable doing so because the supervisor or manager is the subject of the complaint, then please discuss your concerns with your Department Manager, the Division Vice President, or the Vice President of Human Resources.

We will do our best to keep all such expressions of concern, their investigation, and the terms of their resolution confidential, to the extent it is appropriate to do so. If a work-related concern cannot be addressed through these communication channels, or if you prefer, you may use the following complaint resolution process.

FILING OF COMPLAINT AND INVESTIGATION

Please file an oral complaint or a detailed written complaint with either your manager or the Vice President of Human Resources as soon as possible after the events that cause your concern.

Depending on the nature of the complaint, the department manager or the Vice President of Human Resources or a designee acting as the investigative officer will investigate your complaint by meeting separately with you and with others who are named in your complaint or who may have knowledge of the facts set forth in your complaint.

The investigative officer will provide you with an oral report about the findings of the investigation. If the complaint is resolved to your satisfaction, the terms of the resolution will be recorded and signed by you and the investigative officer.

APPEAL

If the complaint is not resolved to your satisfaction, you may submit a written request for review of your complaint to the Executive Vice President & COO, who will review your complaint and the investigation that was conducted. You will then receive an oral explanation of the conclusion reached and the reasons for that conclusion.