



Harassment

Sexual and Other Types of Harassment

Crum has established a zero-tolerance standard for any type of harassment. As an equal opportunity employer, Crum is committed to providing all of its employee/ICs with a workplace that is free of harassment.

This includes sexual harassment as well as verbal, physical, or psychological harassment due to race, color, religion, sex, national origin, disability, age, or any other protected characteristic under state or federal law.

Crum shall follow all applicable state and federal (Equal Employment Opportunity Commission) laws in prohibiting sexual harassment or harassment of any type, in our workplace and while performing any and all work-related duties.

Crum defines its workplace as not being limited to a Crum facility and includes all company functions (on- and off-site), business travel, vendor locations, customer locations, and any other location where Crum business is conducted.

This policy applies to all Crum employee/ICs/ Independent Contractors and all non-employee/ICs with whom a Crum employee/IC may come into contact with during the daily performance of his/her job, including: ***customers, visitors, suppliers, vendors, contractors, temporary employee/ICs, and/or other individuals.***

It is further understood that any of these individuals may be a victim or a violator under this Crum policy.

Sexual & Other Types of Harassment Procedures

Crum's sexual and other harassment procedures have been developed to achieve several goals.

They include: (1) to clearly define sexual and other types of harassment; (2) to make sure all Crum employee/ICs understand that the company will not tolerate any sexual or other form of harassment; (3) to make sure all Crum employee/ICs understand that violators of this policy may be subject to disciplinary action, up to and including termination of employment; and (4) to ensure employee/ICs understand they will not be subject to retaliation or discipline for reporting or complaining of any type of harassment.

Definition of Harassment

Crum defines harassment as a single incident or a pattern of behavior which entails verbal, physical, or psychological harassment/abuse of any nature which: (1) has the purpose or effect of creating an intimidating, hostile, or offensive work environment; (2) has the purpose or effect of unreasonably interfering with an individual's work performance; and/or (3) adversely affects an individual's employment or advancement opportunities.

Definition of Sexual Harassment

According to the EEOC's guidelines, sexual harassment is a form of discrimination prohibited by Title VII of the Civil Rights Act. It can include several forms, including unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature (including same-sex harassment) when:

- submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- submission to or rejection of such conduct by an individual is used as either the basis for, or a factor in, an employment decision affecting such individual; or
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Conduct and Behavior Which May be Considered Sexual Harassment

Crum expects each employee/IC/IC to exercise sound personal judgment concerning the possible effects on others of his/her actions - specifically but not limited to personal behavior and language.

Inappropriate, unacceptable, or offensive behavior and language that could be considered sexual harassment may include:

- Unwelcome or unwanted sexual advances. This means patting, pinching, hugging, cornering, kissing, fondling, brushing up against, or any other similar physical contact considered unacceptable by another individual.
- Requests or demands for sexual favors. This includes subtle or blatant expectations, pressures, or requests for any type of sexual favor accompanied by an implied or stated promise of preferential treatment or negative consequences concerning one's employment status or advancement opportunity.
- Verbal abuse (even if intended as kidding) that is of a sexual nature and considered unacceptable or offensive by another individual. This includes graphic comments about an individual's body or appearance, sexually degrading words to describe an individual, or telling sexually graphic jokes or stories that may be offensive to others.
- Engaging in unwanted sexually oriented conduct with someone that interferes with his/her work activities or performance.
- Creating a hostile, offensive, or intimidating work environment. This includes the display in the workplace of sexually suggestive objects, materials, or pictures.

Conduct and Behavior Which May Not be Considered Sexual Harassment

Normal, courteous, mutually respectful, non-coercive conversations and interactions between employee/ICs, customers, visitors, suppliers, vendors, contractors, temporary employee/ICs, and/or other individuals that are acceptable to both parties may not be considered sexual harassment.

Isolated comments of a sexual nature, while possibly objectionable, are not necessarily sexual harassment.

Furthermore, as a general rule, conduct between consenting parties, or actions arising out of current personal or social relationships where there is no coercion involved, may not be viewed as sexual harassment.

Conduct and Behavior Which May be Considered Harassment

Crum is committed to creating an environment that is free of all forms of harassment - both verbal and nonverbal. Language and personal behavior that could be considered harassment (other than sexual) may include:

Verbal harassment

- Telling offensive (ethnic or religious) jokes, taunting, or mimicking others.
- Making disparaging or derogatory comments or remarks that perpetuate stereotypes about a protected individual or group.
- Directing denigrating slurs, epithets, insults or comments towards a protected individual or group.
- Making verbal threats of physical violence, intimidating other employee/ICs, or making harassing phone calls.

Nonverbal harassment.

- Displaying offensive, derogatory, inappropriate, or other graphic materials in common areas.
- Segregating or discriminating against an employee/IC or co-worker.
- Physically assaulting, abusing, or threatening specific employee/ICs or co-workers.

Complaint Reporting

Any Crum employee/IC believing he/she has been the victim of sexual or other harassment should report the complaint/incident or alleged discrimination without fear of retaliation.

Crum encourages all employee/ICs to report any sexual or other harassment situation as promptly as possible.

The report should be made to:

- the employee/IC's immediate supervisor; or

- Ronda Crum/Office Manager; if the complaint involves the employee/IC's immediate supervisor; or
- any management individual with whom the employee/IC feels comfortable.

Investigation Procedures

All complaints will be promptly and thoroughly investigated by Ronda Crum/Office Manager, who will conduct a fair and impartial investigation.

Interim measures may be taken pending full investigation and resolution of the complaint, such as temporary reassignments or separating the alleged violator and the complainant.

The investigator shall discuss the complaint with both parties and shall question all employee/ICs who may have knowledge of either the actual incident or similar situations. The complaint, investigative steps and findings, and disposition shall be documented.

Complaints shall remain confidential except where circumstances arise in which others may have a need to know.

When the investigation is complete, the investigator will consult Keith Crum/President and shall recommend any appropriate corrective or disciplinary action to the employee/ICs' immediate supervisor. Results of the investigation and any recommended corrective or disciplinary action shall be communicated to the individual who filed the complaint.

If the investigation reveals that an employee/IC has engaged in harassment, that individual shall be subject to disciplinary action up to and including termination.

An employee/IC who is dissatisfied with the resolution of a complaint should discuss the matter with Ronda Crum/Office Manager, who will review the matter and determine whether additional action is justified or warranted.

Complaints of Harassment against Non-Employee/ICs

Any Crum employee/IC who feels that he/she has been harassed by a non-employee/IC while performing normal work-related duties or during a normal workday, or at a Crum function, should report the incident to his/her immediate supervisor or other Crum management personnel as soon as possible. Crum management personnel are expected to assess the situation and take prompt and appropriate action.

An employee/IC who is dissatisfied with the resolution of a complaint against a non-employee/IC should discuss the matter with Ronda Crum/Office Manager, who will review the matter and determine whether additional action is justified or warranted.

Other Related Information

Crum will not tolerate any form of retaliation towards employee/ICs who come forward with any type of harassment complaints. Any retaliation incidents should be reported to Ronda Crum/Office Manager.

Any Crum employee/IC who presents a knowingly false or frivolous claim that is proven to be untrue could be subject to civil repercussions from the falsely-accused party.

Final Recourse

- I. Crum employee/ICs are entitled to file complaints of harassment with the Equal Employment Opportunity Commission or other appropriate government agency. However, the company believes any and all complaints can be resolved internally. Ronda Crum/Office Manager will be responsible for establishing and maintaining the documentation.