

PURPOSE:

Chatham Area Transit Authority (CAT) is an equal opportunity employer. CAT is committed to providing a work environment free of harassment, discrimination, retaliation and disrespectful or other unprofessional conduct based on sex (including pregnancy, childbirth, breastfeeding or related medical conditions), race, religion (including religious dress and grooming practices), color, gender (including gender identity and gender expression), national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status, registered domestic partner status, age, sexual orientation, military and veteran status or any other basis protected by federal, state or local law or ordinance or regulation. CAT also prohibits discrimination, harassment, disrespectful or unprofessional conduct based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics.

In addition, CAT prohibits retaliation against individuals who raise complaints of discrimination or harassment or who participate in workplace investigations. All such conduct violates CAT's policy.

DEFINITIONS:

N/A

SPECIFICS:

A. Harassment Prevention

CAT's policy prohibiting harassment applies to all persons involved in the operations of CAT. CAT prohibits harassment, disrespectful or unprofessional conduct by any employee of CAT, including supervisors, managers and co-workers. This policy also applies to board members, vendors, customers, independent contractors, interns, volunteers, persons providing services pursuant to a contract and other persons with whom you come into contact while working.

Prohibited harassment, disrespectful or unprofessional conduct includes, but is not limited to, the following behavior:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations, comments, posts or messages;
- Visual displays such as derogatory and/or sexually-oriented posters, photography, cartoons, drawings or gestures;
- Physical conduct including assault, unwanted touching, intentionally blocking normal movement or interfering with work because of sex, race or any other protected basis;

- Threats and demands to submit to sexual requests or sexual advances as a condition of continued employment, or to avoid some other loss and offers of employment benefits in return for sexual favors;
- Retaliation for reporting or threatening to report harassment; and
- Communication via electronic media of any type that includes any conduct that is prohibited by state and/or federal law or by CAT policy.

Sexual harassment does not need to be motivated by sexual desire to be unlawful or to violate this policy. For example, hostile acts toward an employee because of his/her gender can amount to sexual harassment, regardless of whether the treatment is motivated by sexual desire. Prohibited harassment is not just sexual harassment but harassment based on any protected category.

B. Non-Discrimination

CAT is committed to compliance with all applicable laws providing equal employment opportunities. This commitment applies to all persons involved in CAT's operations. CAT's prohibits unlawful discrimination against any job applicant, employee or intern by any employee of CAT, including supervisors and coworkers.

Pay discrimination between employees of the opposite sex performing substantially similar work, as defined by the Fair Pay Act and federal law, is prohibited. Pay differentials may be valid in certain situations defined by law. Employees will not be retaliated against for inquiring about or discussing wages. However, CAT is not obligated to disclose the wages of other employees.

C. Anti-Retaliation

CAT will not retaliate against anyone for filing a complaint or participating in any workplace investigation and will not tolerate or permit retaliation by management, employees or co-workers

D. Reasonable Accommodation

Discrimination can also include failing to reasonably accommodate religious practices or qualified individuals with disabilities where the accommodation does not pose an undue hardship.

To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, CAT will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee unless undue hardship would result.

Any job applicant or employee who requires an accommodation in order to perform the essential functions of the job should contact a CAT representative with day-to-day personnel responsibilities

and discuss the need for an accommodation. The Company will engage in an interactive process with the employee to identify possible accommodations that will help the applicant or employee perform the job.

An applicant, employee or intern who requires an accommodation of a religious belief or practice (including religious dress and grooming practices, such as religious clothing or hairstyles) should also contact a CAT representative with day-to-day personnel responsibilities and discuss the need for an accommodation. If the accommodation is reasonable and will not impose an undue hardship, CAT will make the accommodation.

The Company will not retaliate against you for requesting a reasonable accommodation and will not knowingly tolerate or permit retaliation by management, employees or co-workers.

E. Complaint Process

Individuals who believe that they have been subjected to discrimination or harassment that is unlawful or in violation of this policy should promptly report it to the EEO Officer, Ethics and Compliance Hotline, Human Resources Department or contact Compliance Department.

Reports may be made anonymously and will be treated in a confidential manner.

Human Resources: 912-629-3906 or hr@catchacat.org
Compliance Department: 912-629-3958 or david.stearns@catchacat.org

Ethics and Compliance Hotline

Website: www.lighthouse-services.com/catchacat

Toll-Free Telephone:

- English speaking USA and Canada: **833-222-3243**
- Spanish speaking USA and Canada: **800-216-1288**
- Spanish speaking Mexico: **01-800-681-5340**
- French speaking Canada: **855-725-0002**

E-mail: reports@lighthouse-services.com

(must include CAT name with report)

Fax: (215) 689-3885 *must include CAT name with report*

Supervisors must refer all complaints involving harassment, discrimination, retaliation or other prohibited conduct to the EEO Officer, Ethics and Compliance Hotline, Human Resources Department or the Compliance Department.

When the Company receives allegations of misconduct, it will immediately undertake a fair, timely, thorough and objective investigation of the allegations in accordance with all legal requirements. CAT will reach reasonable conclusions based on the evidence collected. CAT will maintain confidentiality to the extent possible. However, the Company cannot promise complete confidentiality. The employer's duty to investigate and take corrective action may require the disclosure of information to individuals with a need to know. Complaints will be:

- Responded to in a timely manner
- Kept confidential to the extent possible
- Investigated impartially by qualified personnel in a timely manner
- Documented and tracked for reasonable progress
- Given appropriate options for remedial action and resolution
- Closed in a timely manner

If CAT determines that harassment, discrimination, retaliation or other prohibited conduct has occurred, appropriate and effective corrective and remedial action will be taken in accordance with the circumstances involved. In addition, CAT will also take appropriate action to deter future misconduct.

Any employee determined by CAT to be responsible for harassment, discrimination, retaliation or other prohibited conduct will be subject to appropriate disciplinary action, up to, and including termination. Employees should also know that if they engage in unlawful harassment, they can be held personally liable for the misconduct.

REFERENCES:

- Equal Pay Act of 1963, 29 U.S.C. 201
- Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d
- Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e
- Age Discrimination in Employment Act of 1967, 29 U.S.C. 633a
- Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794
- 28 CFR Part 42, Subpart F, "Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs"
- 29 CFR Part 1605, "Guidelines on Discrimination Because of Religion"
- 29 CFR Part 1606, "Guidelines on Discrimination Because of National Origin"
- 29 CFR Part 1607, "Uniform Guidelines on Employee Selection Procedures"
- 29 CFR Part 1620, "The Equal Pay Act"
- 29 CFR Part 1625, "Age Discrimination in Employment Act"
- 49 CFR Part 21, "Nondiscrimination in Federally Assisted Programs of the Department of Transportation Effectuation of Title VI of the Civil Rights Act of 1964"

- 49 CFR Part 27, “Nondiscrimination on the Basis of Handicap in Financial Assistance Programs”
- CAT’s Equal Employment Opportunity Program

APPLIES TO:

All CAT employees and Departments.

ATTACHMENTS:

None.