Chalfonte Foundation Harassment Prevention Policy

Chalfonte Foundation (the "Corporation") is committed to a community work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal opportunities and prohibits discriminatory practices, including harassment. Therefore, the Corporation expects that all relationships among persons in the community workplace will be business-like and free of bias, prejudice, discrimination, and harassment. In order to keep this commitment, the Corporation maintains a strict policy of prohibiting unlawful harassment of any kind, including sexual harassment and harassment based on race, color, religion, national origin, sexual orientation, gender identity or expression, sex, age, physical or mental disability or any other characteristic protected by state, federal or local employment discrimination laws. This policy applies to all member employees and contractors, including supervisors and non-supervisory employees, and nonemployees who engage in unlawful harassment in the community workplace.

Sexual harassment includes, but is not limited to, making unwanted sexual advances and requests for sexual favors where either:

- 1. Submission to such conduct is made an explicit or implicit term or condition of employment or membership;
- 2. Submission to or rejection of such conduct by an individual is used as the basis of employment or membership decisions affecting such individual; or
- 3. 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.

Member employees or contractors who violate this policy are subject to discipline up to and including the possibility of immediate discharge or cancellation of contractual obligations. Examples of unlawful harassment include, but are not limited to:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations or comments.
- Visual conduct such as derogatory and/or sexually oriented posters, photography, cartoons, drawings, email and faxes or gestures.
- Physical conduct such as assault, unwanted touching, blocking normal movement or interfering with work directed at an employee because of the employee's sex or other protected characteristic.
- Threats and demands to submit to sexual requests in order to keep one's job or avoid some other loss, and offers of employment or membership benefits in return for sexual favors.
- Retaliation for having reported or threatened to report unlawful harassment.

Compliance and Procedures

The Corporation's policies and supporting practices are built upon our Diversity and Inclusion Philosophy as well as a set of values that include a strong belief that all people should be treated with dignity and respect. In accordance with this, it shall be company policy to comply with all applicable national, state, and local laws pertaining to harassment of any kind. In furtherance of this commitment, it will be a fundamental procedure of the Corporation to annually update and take action-oriented steps to undertake regular evaluation and audits of our efforts and progress in regards to harassment prevention and reporting.

It is the responsibility of each and every member employee of the Corporation to give our policy of harassment prevention real meaning and full support.

The Corporation's procedure for responding to individual harassment complaints is guided by the regulations of the Equal Employment Opportunity Commission. These procedures are posted in areas throughout the facilities of the Corporation. Any employee or member or applicant for employment or membership who believes that unlawful harassment has occurred either to themselves or to some other member of the Corporation should promptly report the facts of the incident or incidents and the names of the individual(s) involved to his or her supervisor, or in the alternative, to the Director of Human Resources or the Director's designee or the Chair of the Ethics and Corporate Responsibility Committee. The Ethics and Corporate Responsibility Committee will then conduct a thorough investigation. No employee or member of the Corporation will be the subject of any retaliation for filing a complaint of harassment or for participating in any investigation into such a complaint.

ADOPTION OF HARASSMENT PREVENTION POLICY

I do hereby certify on this 7th day of September, 2019 that the above stated Harassment Prevention Policy for Chalfonte Foundation was approved and adopted by the board of directors on September 7, 2019 and constitutes a complete copy of the Harassment Prevention Policy of the Corporation.

By:	/S/	
Name:	Matthew Jastrzembski	
Its: Se	cretary	