



# NORPAC

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QUALITY. CONSISTENCY. INNOVATION.

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## Harassment Policy

**Purpose:** The purpose of this policy is to set the standards that support NORPAC's commitment to provide a workplace free from discrimination and harassment, where employees treat each other with respect, dignity and courtesy.

**Scope:** This policy applies to all applicants, employees, vendors, contractors and third party agents, wherever NORPAC business is being conducted.

**Policy:** NORPAC is committed to providing a workplace free from harassment. As such, NORPAC will not tolerate discrimination or harassment toward any of our employees, independent contractors, supervisors, co-workers, customers, vendors, agents and any other third-parties in the workplace.

- Harassment occurs when (1) an employee is subjected to unwelcome conduct, (2) that is motivated by the employee's membership in a protected category, and (3) which either affects a term or condition of the employee's employment, and/or had the purpose or effect of unreasonably interfering with the employee's work performance, and/or created a hostile work environment. A hostile work environment is a workplace that is sufficiently severe or pervasive to create a working environment that a reasonable person would consider intimidating, hostile or abusive.
- The term harassment includes, but is not limited to, slurs, jokes, and other verbal or physical conduct relating to a person's gender, ethnicity, race, color, creed, religion, sexual orientation, gender identity, national origin, age, disability, marital status, military status or any other protected classification that unreasonably interferes with a person's work performance or creates an intimidating, hostile work environment.
- Sexually harassing behavior in particular includes unwelcome conduct such as: sexual advances; requests for sexual favors; offensive touching; sexual or sexist jokes or innuendo; nude, profane, or obscene cartoons, drawings or photographs; whistling; staring or ogling; or other verbal or physical conduct of a sexual nature. Prohibited sexual harassment also includes demands or subtle pressure for sexual favors accompanied by a promise of favorable job treatment or a threat concerning employment.
- Inappropriate electronic communications of a sexual, discriminatory or harassing nature are also prohibited, such as cellular communications, emails, instance and/or text messages, social media posts.
- Such conduct may constitute harassment regardless of whether the conduct is between members of management, between management and staff employees, between coworkers, or directed at employees by nonemployees conducting business with the Company, regardless of gender or sexual orientation. This definition includes many forms of offensive behavior and included gender-based harassment of a person even when the harassment is not sexual in nature, but rather is because of the person's gender. Sexual harassment can include language or conduct against a person of the same sex as the harasser.
- Sexual harassment is not limited to the physical workplace. It can occur during travel, at company events, or via phone, text or social media. Such behavior can also occur outside of scheduled work time.
- **Reporting Requirements and Procedure.** If an employee believes that he or she or any other individual has been subjected to harassment in violation of this policy, whether by an employee or non-employee, the employee must promptly report the facts and names of the individuals involved to **their Team Leads, Manager or Human Resources**. Any employee who learns of, observes, or has reason to be concerned about harassing conduct in violation of this policy must immediately inform **their Team Leads, Managers or Human Resources**. Complaints do not need to be made in writing.
- Any manager or supervisor who receives a report or has any knowledge of harassment or any other violation of this policy must report it immediately to Human Resources.

- NORPAC takes complaints of harassment very seriously. As a result, all complaints of harassment made pursuant to this policy will be thoroughly and promptly investigated.
- In the course of any such investigation, NORPAC will take appropriate measures to maintain the confidentiality of the participants to the extent possible. Although it may be necessary to divulge some information to ensure that a fair investigation is conducted, NORPAC will limit information to only those persons with a need to know of the complaint or of the investigation.
- All parties contacted in the course of a harassment investigation will be expressly reminded that NORPAC will not tolerate retaliation in any form against any employee who believes or is concerned that harassment has occurred and reports such conduct pursuant to this policy. If an investigator concludes that conduct in violation of this policy has occurred, the offending individual(s) will be subject to corrective action, including formal discipline, up to and including termination of employment. Please note that NORPAC's Harassment Policy may be construed to be more protective of employees than the law requires. Regardless, NORPAC will discipline any individual who violates this policy even if such conduct does not rise to the level of a violation of the law.
- **Retaliation is strictly prohibited.** Any employee who files a complaint of unlawful harassment or discrimination in good faith will not be adversely affected in terms and conditions of employment and will not be retaliated against or discharged because of the complaint. In addition, we will not tolerate retaliation against any employee who, in good faith, cooperates in the investigation of a complaint. Employees should report any suspected retaliation to their immediate managers or to Human Resources, so that the report may be promptly investigated and remedied. Anyone who engages in such retaliatory behavior will be subject to appropriate discipline, up to and including termination.
- Retaliation is any action that could discourage an employee from coming forward to make or support a harassment or discriminatory claim, such as termination or demotion, decrease in hours, denying a promotion, transfer to different job/location, negative performance reviews, etc. The action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence for reporting sent via social media or outside of working hours).
- **Distribution of Policy and Training.** To ensure that employees remain educated about their obligations under this policy, NORPAC will distribute this policy annually to all employees and will provide to new employers upon hire. NORPAC will also require all employees to periodically receive training regarding our zero tolerance for harassment at work.
- **External Process.** Reporting harassment to employer does not stop covered person from also making a complaint in a different forum. Employees have the right to file a discrimination, harassment, and/or retaliation complaint with outside agencies, such as the Washington State Human Rights Commission (WSHRC) and the Equal Employment Opportunity Commission (EEOC).

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