

## **Helping Hands Corporation Non-Discrimination and Anti-Harassment Policy**

### **1. Purpose**

- 1.1. Helping Hands Corporation (“**Helping Hands**”) is committed to providing an 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 employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Helping Hands expects that all relationships among persons working for or on behalf of the organization will be business-like and free of explicit bias, prejudice and harassment.
- 1.2. The purpose of this Non-Discrimination and Anti-Harassment Policy (the “**Policy**”) is to ensure that all its staff and volunteers can work in an environment free from unlawful harassment, discrimination and retaliation. Helping Hands will make every reasonable effort to ensure that all concerned are familiar with this Policy and are aware that any complaint in violation of such Policy will be investigated and resolved appropriately.

### **2. Non-Discrimination**

- 2.1. It is the policy of Helping Hands not to discriminate on the basis of race, color, religion, national origin, sex, age, disability, marital or familial status, sexual orientation, gender identity or expression, genetic information, veteran or military status or any other basis prohibited by law.
- 2.2. Helping Hands shall not discriminate:
  - (a) In the provision of any of its services to clients.
  - (b) In any matters of employment, or anywhere else in the organization with regards to hiring, compensation, promotion, access to training, or any other terms and conditions of employment.
  - (c) In the recruitment for, or assignment of, any volunteer activity, which includes participation on the governing board and any committees.
  - (d) In the selection of vendors or other contractors, for goods and services.

### **3. Equal Employment Opportunity**

- 3.1. It is the policy of Helping Hands to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, national origin, sex, age, disability, marital or familial status, sexual orientation, gender identity or expression, genetic information, veteran or military status or any other basis prohibited by law. Helping Hands prohibits any such discrimination or harassment.

### **4. Sexual Harassment**

- 4.1. Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this Policy, “sexual harassment” is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: (a) submission to such conduct is made either explicitly or implicitly a term or condition of an

individual's employment, (b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (c) 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.

- 4.2. Title VII of the Civil Rights Act of 1964 recognizes two types of sexual harassment: (a) quid pro quo and (b) hostile work environment. Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

## **5. Harassment**

- 5.1. Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this Policy, harassment is any verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, national origin, sex, age, disability, marital or familial status, sexual orientation, gender identity or expression, genetic information, veteran or military status or any other basis prohibited by law, or that of his or her relatives, friends or associates, and that: (a) has the purpose or effect of creating an intimidating, hostile or offensive work environment, (b) has the purpose or effect of unreasonably interfering with an individual's work performance, or (c) otherwise adversely affects an individual's employment opportunities.
- 5.2. Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the organization's premises or circulated in the workplace, on company time or using company equipment by e-mail, phone (including voice messages), text messages, social networking sites or other means.

## **6. Retaliation**

- 6.1. Helping Hands encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Helping Hands to promptly and thoroughly investigate such reports. Helping Hands prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.

## **7. Reporting an Incident of Harassment, Discrimination or Retaliation**

- 7.1. Helping Hands encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe that they have been the victim of such conduct should report their concerns orally or in writing to their immediate supervisor or the Chief Executive Officer, and are encouraged to document any incidents as

soon as possible.

## **8. Complaint Procedure**

- 8.1. Helping Hands encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore, while no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of discrimination and/or harassment.
- 8.2. Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.
- 8.3. Helping Hands will maintain confidentiality throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.
- 8.4. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this Policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.
- 8.5. Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling or disciplinary action such as a warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay, or termination, as Helping Hands believes appropriate under the circumstances.
- 8.6. False and malicious complaints of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) shall be subject to appropriate disciplinary action.

**CERTIFICATE OF ADOPTION OF NON-DISCRIMINATION AND  
ANTI-HARASSMENT POLICY**

I do hereby certify that the above Non-Discrimination and Anti-Harassment Policy for Helping Hands was approved and adopted by the Board of Directors on November 29, 2023, and constitutes a complete copy of the Policy.

**Romir Patel, Chairman of the Board**