



## Anti-Harassment

This policy has been developed to ensure that all Altarum enterprise (“Altarum”) employees understand and comply with Altarum’s commitment to a workplace free from discrimination and harassment. The Altarum enterprise includes Altarum Institute and any operating subsidiaries that offer health-related consulting services.

The purpose of this policy is to make clear that harassment will not be tolerated at Altarum and to set forth the procedure for filing harassment complaints.

Altarum remains committed to the premise that all individuals have a right to function in a working environment that is safe, productive, respectful, and free from discrimination. In keeping with this commitment, harassment, based on legally protected characteristics, will not be tolerated.

Any words or actions based on legally protected characteristics that create an intimidating, hostile or offensive working environment for any of us is disrespectful, an embarrassment to Altarum, and contrary to our business objectives. We are all responsible for ensuring that harassment does not occur.

Under this policy, Altarum prohibits harassment by an employee against another employee, an employee against a non-employee, and a non-employee against an employee. Retaliation against an employee who has filed a harassment complaint or participates as a witness in the investigation of such a complaint is prohibited. Altarum also prohibits false, bad faith, or malicious harassment complaints.

## DEFINITIONS

### (A) Definition of Harassment:

“Harassment,” based on legally protected characteristics or activity, is a form of unlawful discrimination. Harassment generally occurs when words or actions which are based on a legally protected characteristic or activity and which are of a severe or pervasive nature create an intimidating, hostile, or offensive working environment or unreasonably interfere with an individual’s work performance. Examples of conduct that may constitute harassment include but are not limited to: slurs; jokes; text messages; electronic messages or content; posting of offensive statements, posters, or cartoons; physical conduct and other similar conduct which are based on an individual’s legally protected characteristic or activity.

Altarum prohibits harassment of an individual on the basis of race, color, national origin, sex, religion, age, sexual orientation, gender identity, disability, veteran status, pregnancy, genetic information or any other protected characteristic or activity covered by applicable federal, state or local law. Further, in accordance with the Equal Employment Opportunity Commission (EEOC) guidelines, Altarum prohibits harassment on the basis of any legally protected characteristic of an employee’s relatives, friends or associates.

### (B) Definition of Sexual Harassment:

The EEOC has issued guidelines which define sexual harassment as:

- Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when such conduct is made either explicitly or implicitly a term or condition of an individual’s employment; or

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- (When) rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- (When) 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.

The technical definition describes two types of sexual harassment: “quid pro quo” and “hostile work environment.”

The first two bullets describe quid pro quo sexual harassment. Quid pro quo literally means “this for that,” and occurs when a supervisor, or someone with authority to influence an employee's job, uses or threatens to use that authority to extort sexual favors.

Some examples of quid pro quo sexual harassment include: offering employment benefits or giving preferential treatment in exchange for sexual favors, and retaliating against or getting back at an employee who rejects sexual advances.

The third bullet describes hostile work environment sexual harassment. This type of harassment occurs when a supervisor, co-worker, subordinate, or a non-employee engages in conduct that is severe or pervasive enough to alter the conditions of an employee's job and create a hostile or abusive working environment.

Some examples of conduct which may constitute hostile work environment sexual harassment include:

- Leering; sexual gestures; displaying sexually suggestive objects or pictures, cartoons, calendars, magazines or posters; whistling and cat calls; making derogatory or sexual comments, epithets or jokes; unwelcome physical contact; threatening conduct, including assault or blocking someone's movement; repeated and unwelcome comments about someone's physical appearance; and other similar conduct based on sex that creates an intimidating, hostile or offensive working environment, or unreasonably interferes with an individual's work performance.

All forms of sexual harassment involve “unwelcome conduct”; meaning, conduct that was not solicited or welcomed by the victim. This includes words or actions between people of different genders or of the same gender.

**(C) Definition of Sexual Orientation:**

Sexual orientation means lesbian, gay, bisexual, or heterosexual orientation, real or perceived, as manifested by identity, acts, statements, or associations.