

Anti-Discrimination and Anti-Harassment Policies

Purpose

The purpose of these policies is to uphold IPA's commitment to supporting its work and the communities in which it operates through maintaining a diverse workforce at all levels of IPA, and through the recognition, acceptance and valuing of individual differences. These policies strive to provide a work environment that is free from intimidation, hostility or other offenses that might interfere with work performance.

Definitions

1. "Genetic Information" includes --

- an individual's family medical history
- the results of an individual's or family member's genetic tests
- the fact that an individual or an individual's family member sought or received genetic services, genetic information of a fetus carried by an individual or
- an individual's family member, or an embryo lawfully held by an individual or family member receiving assistive reproductive services

2. "Harassment" -- verbal or physical conduct that denigrates or shows hostility toward an individual because of his/her race, creed, color, religion, national origin, ancestry, alienage or citizenship status, age, disability or handicap (including HIV/AIDS), sex, marital status, familial status, veteran status, sexual orientation, genetic information or any other characteristic protected by applicable federal, state or local laws, and that 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.

3. "Sexual Harassment" -- engaging in unwelcome sexual, verbal or physical contact, including flirtations, vulgar verbal abuse, graphic or suggestive comments, or any similar behavior which harasses, disrupts or interferes with another employee or which creates an intimidating, offensive or hostile work environment.

Policy

1. Anti-Discrimination Policy

IPA is an **Equal Opportunity Employer** (EOE), adhering to the US laws that prohibit discrimination in the terms and conditions of employment. The IPA EOE policy, as detailed herein, provides equal employment opportunities to all qualified persons without regard to race, creed, color, religion, national origin, ancestry, alienage or citizenship status, age, disability or handicap (including HIV/AIDS), sex, marital status, familial status, veteran status, sexual orientation, genetic information or any other characteristic protected by applicable federal, state or local laws. As a result, IPA adheres to an Affirmative Action Plan.

Equal opportunity and equal consideration will be afforded in all employee actions involving applicants and employees, including recruiting and hiring, selection for training, placement, promotion, rates of pay or other compensation, transfer and layoff, or termination.

Reasonable Accommodation

In accordance with applicable laws including the Americans with Disabilities Act (ADA), the Americans with Disabilities Amendments Act (ADAAA) and the regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC) to ensure equal employment opportunities to qualified individuals with disabilities, IPA will endeavor to make reasonable accommodations for the known physical or mental disabilities of an otherwise qualified employee to enable the employee to perform the essential functions of his or her position unless the accommodation would impose an undue hardship on IPA's operations. If you believe you need a reasonable accommodation, please speak with the Human Resources Department. You may be required to provide medical documentation substantiating the reasons for the requested accommodation and the nature of the accommodation sought.

GINA notice: The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers from requesting or requiring genetic information of an individual or family member, except as specifically allowed by that law. To comply with GINA, please do not provide any genetic information when responding to this request. "Genetic information" includes:

- an individual's family medical history
- the results of an individual's or family member's genetic tests
- the fact that an individual or an individual's family member sought or received genetic services, genetic information of a fetus carried by an individual or
- an individual's family member, or an embryo lawfully held by an individual or family member receiving assistive reproductive services

IPA will maintain the confidentiality of medical information and records of applicants and employees with disabilities in accordance with applicable laws. All employees must respect and

maintain the confidentiality of applicant and employee medical information.

2. Anti-Harassment Policy

IPA strives to provide a work environment that is free from intimidation, hostility or other offenses that might interfere with work performance. As such, IPA will not tolerate verbal or sexual harassment of employees, applicants, clients, volunteers, vendors, consultants, or any other individuals encountered in the course of business because of race, creed, color, religion, national origin, ancestry, alienage or citizenship status, age, disability or handicap (including HIV/AIDS), sex, marital status, familial status, veteran status, sexual orientation, genetic information or any other characteristic protected by applicable federal, state or local laws.

IPA will not tolerate harassing behavior in the workplace itself and in other work-related settings such as business trips, Board meetings, interviews, IPA social events and similar situations connected with IPA's work.

Harassment

Harassment is verbal or physical conduct that denigrates or shows hostility toward an individual because of his/her race, creed, color, religion, national origin, ancestry, alienage or citizenship status, age, disability or handicap (including HIV/AIDS), sex, marital status, familial status, veteran status, sexual orientation, genetic information or any other characteristic protected by applicable federal, state or local laws, and that 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. Harassing conduct includes, but is not limited to:

- Epithets;
- Slurs;
- Negative Stereotyping;
- Threatening, intimidating or hostile acts that relate to the above characteristics;
- Written, electronically disseminated or graphic material that denigrates or shows hostility to a certain group;
- Abusive treatment that does not itself relate to a protected characteristic, but is motivated by the recipients protected status;
- Any retaliation against another person for reporting, or stating intent to report, harassment based on any protected category

Sexual Harassment

IPA prohibits any employee from engaging in unwelcome sexual, verbal or physical contact, including flirtations, vulgar verbal abuse, graphic or suggestive comments, or any similar behavior which harasses, disrupts or interferes with another employee or which creates an intimidating, offensive or hostile work environment.

While it is not possible to list all possible forms of conduct which, if unwelcome, may constitute sexual or other unlawful harassment, examples of sexually harassing behavior include:

- Unwelcome sexual advances, requests for sexual favors and all other verbal or physical conduct of a sexual or otherwise offensive nature, especially where
- Submission to such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as the basis for decisions affecting an individual's employment; or
- Such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment.
- Offensive comments, jokes, innuendos, and other sexually oriented statements.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects, pictures, cartoons or posters
- Harassment not involving sexual activity or language but directed at someone because of his or her gender

3. Reporting Requirements and Procedure

Anti-Discrimination & Anti-Harassment Policy Violations

Internal Complaint Process

Procedure

If an employee believes a work condition or treatment is in violation of IPA's AntiDiscrimination or Anti- Harassment policies, s/he should discuss the matter with her/his manager. An employee who does not believe s/he can discuss such a concern with his/her supervisor should report the matter to a member of his/her direct management team (such as a Country Director or Department Director), or the Human Resources Department. Employees may also report suspected violations of IPA's AntiDiscrimination or Anti-Harassment policies to the Director of Human Resources, or on IPA's whistleblower hotline (Please see IPA's [Whistleblower Policy](#)).

Confidentiality and Anonymity

Reports will be kept as confidential to the extent that non-disclosure does not hinder IPA's ability to conduct an effective investigation. While IPA will accept and appropriately act upon anonymous reports of possible violations of policy or other misconduct, IPA strongly encourages employees and applicants to identify themselves when making reports to support IPA's ability to conduct investigations.

Investigation

If IPA receives a report of conduct in violation of IPA policy or other misconduct, the report will be investigated promptly and appropriate action will be taken. All IPA employees must cooperate fully with such an investigation.

Anti-Retaliation

IPA will not tolerate retaliation or retribution in any form for outlined honest reporting procedures. Retaliation or retribution is a violation of our policies and is subject to corrective action, up to and including termination