



Innovations for Poverty Action	Anti-Discrimination, Anti-Harassment, Sexual Harassment, Anti-Retaliation, Workplace Bullying	
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***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. Accordingly, IPA will not tolerate unlawful discrimination. As noted in its Equal Opportunity Policy above, IPA prohibits discrimination on the basis of race, creed, color, religion, national or ethnic origin, ancestry, age, disability (including HIV/AIDS), sex, marital status, familial status, military or veteran status, sexual orientation, genetic information, gender identity or expression, status as a victim of domestic violence, or any other factors as prohibited by applicable federal, state and local law. IPA is committed to enforcing this Anti-Discrimination Policy at all levels within the organization, and any employee who engages in prohibited discrimination will be subject to discipline, up to and including termination, at IPA’s discretion.

***Anti-Harassment Policy***

IPA strives to provide a work environment that is free from intimidation, hostility or other offensive conduct that might interfere with work performance. As such, IPA will not tolerate the unlawful harassment of employees, applicants, stakeholders, interns, volunteers, vendors, consultants, or any other individuals encountered in the course of IPA business due to an individual’s race, creed, color, religion, national or ethnic origin, ancestry, age, disability (including HIV/AIDS), sex, marital status, familial status, military or veteran status, sexual orientation, genetic information, gender identity or expression, status as a victim of domestic violence, or any other factors as prohibited 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. IPA is committed to enforcing this Anti-Harassment Policy at all levels within the organization, and any employee who engages in prohibited harassment will be subject to discipline, up to and including termination, at IPA’s discretion.

Harassment is verbal or physical conduct that denigrates or shows hostility toward an individual because of their race, creed, color, religion, national or ethnic origin, ancestry, age, disability (including HIV/AIDS), sex, marital status, familial status, veteran status, sexual orientation, genetic information, gender identity or expression, status as a victim of domestic violence, or any other characteristic protected by applicable federal, state, or local law (protected characteristics) and which has (a) 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. Harassing conduct includes, but is not limited to:

Epithets or slurs

Negative stereotyping

Threatening, intimidating or hostile acts that relate to the above protected characteristics

Written, electronically disseminated or graphic material that denigrates or shows hostility based on a protected characteristic

Abusive treatment that does not itself relate to a protected characteristic, but is motivated by the recipient's protected status

Any retaliation against another person for reporting, or stating intent to report, harassment based on any protected category

### **Sexual Harassment**

IPA also prohibits any employee from engaging in sexual harassment. Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- 1) An individual's submission to such conduct is made a term or condition of their employment.
- 2) An individual's submission to or rejection of such conduct is used as a basis for employment decisions affecting that 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 work environment.

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

- 1) offensive and unwelcome physical contact of a sexual nature, including the touching of another's body, the touching or display of one's own body or any similar contact
- 2) offensive graphic, vulgar, or suggestive comments, jokes, innuendos, and other sexually oriented statements
- 3) demanding sexual favors in exchange for granting some benefit (for example a promotion, raise or better work schedule)
- 4) making or threatening reprisals (for example, a termination or demotion) after receiving a negative response to sexual advances
- 5) visual conduct including leering, making sexual gestures, or displaying of sexually suggestive objects, pictures, cartoons or posters

Harassing conduct not involving sexual activity or language but directed at someone because of the employee's sex is also considered prohibited harassment.

### **Internal Complaint Process for Anti-Discrimination and Anti-Harassment Policy Violations**

If an employee believes a work condition or treatment is in violation of IPA's Anti-Discrimination or Anti-Harassment policies has occurred, they have the responsibility to report the violation to their supervisor. In most cases, an employee's manager is in the best position to address the area of concern. However, if an employee is not comfortable speaking with their manager or is not satisfied with the manager's response, the employee is encouraged to report the matter to anyone in management whom the employee is comfortable in approaching. Employees may also report suspected violations of IPA's Anti-Discrimination or Anti-Harassment policies on IPA's whistleblower hotline (see Whistleblower Policy and Procedure). IPA cannot take prompt and effective remedial action unless each employee assumes the responsibility of reporting any incident of discrimination or harassment immediately via appropriate channels.

IPA will maintain confidentiality as appropriate to the extent practical under the circumstances and consistent with the need 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 job applicants to identify themselves when making reports to support IPA's ability to conduct investigations. Reports will be kept confidential to the extent that non-disclosure does not hinder IPA's ability to conduct an effective investigation.

If IPA receives a report of conduct that violates the Anti-Discrimination and Anti-Harassment policies, the report will be investigated promptly and impartially, and appropriate action will be taken. All IPA employees must cooperate fully with such an investigation.

### ***Anti-Retaliation***

No employee who in good faith reports discriminatory or harassing conduct in violation of IPA's Anti-Discrimination or Anti-Harassment policies, shall suffer harassment, retaliation or adverse employment consequence because of that report.

No IPA employee is authorized, or permitted, to retaliate or to take any adverse employment action whatsoever against anyone for their good faith report of unlawful harassment, opposition to any other discriminatory practice in the workplace or report a violation of IPA policy. Any employee who retaliates against anyone for such good-faith conduct is subject to corrective action, up to and including termination, at IPA's discretion.

Any employee who feels they have been retaliated against in violation of this anti-retaliation provision is responsible for reporting the retaliation to management, in the same manner outlined above.

### ***Workplace Bullying***

IPA defines bullying as "repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one (1) or more persons against another or others, at the place of work and/or during employment." Such behavior violates the organization's Code of Conduct, which clearly states that all employees will be treated with dignity and respect.

The purpose of this policy is to communicate to all employees, including Managers and Executives, that IPA will not tolerate bullying behavior. Violations of this policy will result in corrective action, up to and including termination.

Bullying may be intentional or unintentional. The intention of the alleged bully is irrelevant in whether bullying occurred, it is the behavior that is unacceptable. The following types of behavior are examples of bullying:

*Verbal bullying:* Slandering, ridiculing or maligning a person or their family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.

*Physical bullying:* Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault; damage to a person's work area or property.

*Gesture bullying:* Nonverbal threatening gestures or glances that convey threatening messages.

*Exclusion:* Socially or physically excluding or disregarding a person in work-related activities.