



Policy # Anti-Harassment Procedure

Purpose: This procedure should be used to address issues that arise in relation to the OCH Anti-Harassment Policy.

Complaint Process:

OCH will courteously treat any person who invokes this complaint procedure, and the company will handle all complaints swiftly and confidentially to the extent possible. Lodging a complaint will in no way be used against the employee or have an adverse impact on the individual's employment status. However, filing groundless or malicious complaints is considered an abuse and may be treated as a violation.

Complaint procedure: OCH has established the following procedure for lodging a complaint of harassment, discrimination or retaliation.

1. An individual who feels harassed, discriminated or retaliated against may initiate the complaint process by filing a complaint in writing with OCH's Director of Administration. If the complaint is against the Director of Administration, it may be filed with the Executive Director. If the complaint is against the Executive Director, the complaint may be filed to the President of the Board of Directors. The person that the complaint is brought to will then become the Investigating Official. No formal action will be taken against any person under this policy until an individual has submitted a written and signed complaint containing sufficient details to determine if the policy has been violated. If a supervisor or manager becomes aware that harassment or discrimination is occurring, either from personal observation or as a result of an employee's coming forward, the supervisor or manager should immediately report it to the Director of Administration or other appropriate officer.
2. Upon receiving a complaint or being advised by a supervisor or manager that violation of this policy may be occurring, the Investigating Official will review the complaint, and may consult the company's legal and human resources counsel.
3. The Investigating Official, together with legal counsel or other officers as appropriate, may interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.
4. If it is determined that harassment or discrimination in violation of this policy has occurred, the Investigating Official will recommend appropriate disciplinary action. The appropriate action will depend on the following factors: a) the severity, frequency and pervasiveness of the conduct; b) prior complaints made by the complainant; c) prior complaints made against the respondent; and d) the quality of the evidence (e.g., first-hand knowledge, credible corroboration).

5. If the investigation is inconclusive or if it is determined that there has been no violation of policy but potentially problematic conduct may have occurred, the Investigating Official may recommend appropriate preventive action.
6. The Investigating Officials will report the company's decision to the complainant, the respondent, and the appropriate management assigned to complainant and the respondent. The company's decision will be in writing and will include findings of fact and a statement for or against disciplinary action. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

Consensual Romantic or Sexual Relationships:

If any employee or Board member of OCH enters into a consensual relationship that is romantic or sexual in nature with another employee, Board member, contractor or contracting partner of the OCH, the parties must notify the Director of Administration. Because of potential issues regarding harassment, OCH has made reporting mandatory. The Director of Administration will notify the Executive Director and the Board President, who will keep knowledge of the relationship confidential.

Once the relationship is made known to OCH, the appropriate officer will review the situation with legal and human resources counsel and will determine whether further action should be taken. If it is determined that OCH business cannot be conducted in a manner that is consistent with the Anti-Harassment Policy, the parties will be given the option of ending their relationship, or one or both parties may terminate their employment or contract with OCH. If the parties cannot amicably come to a decision, the Director of Administration, in consultation with the Board President and Executive Director, will decide which party should be moved. OCH reserves the right to determine that a relationship is disruptive to the work environment at any time given new information or developments.