

## **POLICY AGAINST WORKPLACE HARASSMENT**

### **You can't do that here!**

Frost Brown Todd LLP prohibits workplace harassment of its employees. This policy applies to harassment on the basis of race, color, sex, sexual orientation or preference, gender identity, national origin, age (40 and over), religion, marital status, disability or veteran status. Harassing conduct, or condoning such conduct, may result in disciplinary action up to and including dismissal or other action as appropriate. All partners and employees must take this policy extremely seriously. You just can't do that here.

Frost Brown Todd LLP's policy against workplace harassment applies to all of our partners, associates, attorneys in other categories, supervisors and staff.

Specifically, no one who supervises or otherwise exercises control over the terms and conditions of an employee's employment shall threaten or insinuate, either explicitly or implicitly, that an employee's refusal to submit to sexual advances will adversely affect the employee with regard to such employment conditions as hiring, termination, promotion, wages or a significant change in benefits, or that an employee's acceptance of sexual advances will positively affect an employee with respect to such employment conditions.

Any unwelcome verbal or physical conduct, whether committed by supervisors or non-supervisors, may be viewed as harassment if such conduct is because of protected characteristics such as race or gender and has the purpose or effect of unreasonably interfering with an individual's job performance or creating an intimidating, hostile or offensive work environment. It is important to remember that inappropriate and unprofessional remarks or conduct may be reason for intervention and discipline whether or not they are actually "harassing."

We cannot list all possible examples of poor judgment or unprofessional conduct. However, the following examples will serve to illustrate the kind of speech or behavior we do not want in our workplace. Prohibited conduct includes such things as: verbal abuse of a sexual, racial or ethnic nature, sexual gestures, commenting about an individual's body in a sexually offensive manner, degrading words used to describe an individual's race, age, sex, sexual orientation, religion, ancestry or disability, suggestive or offensive objects, pictures, cartoons, magazines, e-mails or computer images.

Consensual sexual relationships between individuals, one of whom exerts control or influence over the other's employment, are problematic and generally not tolerated. Control or influence means the ability to affect, directly or indirectly, an individual's terms and conditions of employment, such as compensation, benefits, advancement, retention, work assignments and opportunities. If you become involved in such a relationship, consult with a member of the Executive Committee, Legal Personnel Committee or Chief Human Resources Officer so that the situation can be appropriately managed.

## **Your Responsibility**

It is everyone's responsibility to maintain a discrimination and harassment-free work atmosphere. This includes freedom from harassment not only by fellow employees, but also by other persons whom Frost Brown Todd LLP's employees encounter in the course of their employment, provided that the Firm is made aware of such harassment or misconduct. If you have a complaint or concern about possible harassment in connection with incidents you have experienced or of which you are aware, you are **REQUIRED** to report such complaint or concern **IMMEDIATELY**. Frost Brown Todd LLP is prepared to receive complaints about behavior that is perceived as unprofessional or inappropriate regardless of whether the behavior constitutes unlawful harassment.

Business professionals must report any concern or complaint immediately to the Firm's Chief Operating Officer, Chief Human Resources Officer or a member of the Executive Committee. Attorneys must report any concern or complaint immediately to a member of the Legal Personnel Committee, or a member of the Executive Committee. Reports will be investigated and, where appropriate, prompt corrective action will be taken. If, in your view, there is another incident of inappropriate conduct or speech following a report, you must report it again, immediately. Investigation and corrective action will again be undertaken as appropriate.

## **You Will Not Be Penalized for Reporting Under This Policy**

Retaliation against an employee because of a report under this policy or because an employee has participated in an investigation under this policy is prohibited and will not be tolerated. Any suspected retaliation must also be immediately reported to the persons set forth above. Regardless of who is involved or the status of the accused – retaliation is not permitted. Complaints of retaliation will be investigated and, where appropriate, may lead to disciplinary action up to and including dismissal. Supervisors who act inconsistently with or contrary to this policy are acting beyond the scope of their authority. This policy is not intended to create any contractual rights.

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