

Mr. & Mrs. S.H. Wong Center for the Study of Multinational Corporations

Equal Employment Opportunity Employer, Harassment, and Whistleblower Policies

EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

The Center is an equal employment opportunity employer. The Center does not discriminate on the basis of race, color, creed, gender, sexual orientation, marital status, pregnancy, national origin, ancestry, age, religion, medical condition, physical or mental disability, citizenship status, military service status, or any other basis protected by state law, federal law, or local ordinance.

HARASSMENT PREVENTION

It is the policy of the Center to provide a work environment free of harassment. Employees are expected to maintain a productive work environment that is free from harassing or disruptive activity. No form of harassment of employees, applicants, volunteers or contractors will be tolerated.

The Center's policy prohibits all forms of unlawful harassment, including sexual harassment and harassment based on pregnancy, childbirth or related medical conditions, race, religious creed, color, national origin or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, citizenship status, military service or veteran status, gender identity and gender expression or any other basis protected by federal, state or local law or ordinance or regulation. This policy prohibits harassment or discrimination of employees, volunteers, applicants, contractors or vendors by supervisors, board members, fellow employees, contractors, vendors or volunteers.

Prohibited Behavior

Harassment of any kind at the Center is strictly prohibited. Any kind of harassment, including verbal, visual and physical harassment of others will not be tolerated and will be grounds for discipline, up to and including termination.

Sexual Harassment: Under California and federal law, sexual harassment is defined as unwelcome or unwanted advances, requests for sexual favors, and any other verbal, visual, or physical conduct of a sexual nature when: (1) submission to or rejection of such conduct is used as a factor in decisions affecting hiring, evaluation, promotion or other aspects of employment; or (2) such conduct has the purpose or effect of substantially interfering with an individual's employment or creating an intimidating, hostile, or offensive work environment.

Examples of sexual harassment include, but are not limited to, the following:

- Verbal conduct, such as sexually suggestive or obscene comments, threats, slurs, epithets, jokes about gender-specific traits, or sexual propositions;

- Physical conduct, such as intentional touching, pinching, brushing against another's body, impeding or blocking movement, assault, or coercing sexual contact;
- Written conduct, such as sexually suggestive or obscene letters, notes, invitations; or
- Visual conduct, such as leering or staring at another's body, gesturing, or displaying sexually suggestive objects or pictures, cartoons, posters or magazines.

Sexual harassment also includes continuing to express sexual or inappropriate interest after being informed directly that the interest is unwelcome or using sexual behavior to control, influence or affect another employee, job applicant, volunteer or contractor of the Center.

It is also impermissible to suggest, threaten or imply that failure to accept a request for a date or sexual intimacy will affect another's job prospects. For example, it is forbidden either to imply or actually withhold support for promotion, or change of assignment, or suggest that a poor performance report will be given because an employee has declined a sexual proposition. In addition, it is forbidden to offer benefits, such as promotions, favorable performance evaluations, favorable assigned duties or shifts, recommendations or other benefits in exchange for sexual favors.

These types of behavior are unacceptable in the workplace itself and in other work-related settings, such as business trips and business-related social events. In evaluating behavior, the standard that will be applied is that of a reasonable victim with the same fundamental characteristics as the person who complains of harassment. Thus, for example, in the case of sexual harassment, the standard will be that of a reasonable victim of the same gender as the person who is complaining.

Harassment by Non-Employees

The Center will take all reasonable steps to eliminate sexual harassment and any other harassment by non-employees, including contractors, and vendors, who have contact with our employees, job applicants or volunteers.

Penalties for Violation of this Policy

Anyone who is found to have violated this policy shall be subject to appropriate disciplinary action, up to and including discharge, according to the findings of the investigation of the complaint. The harasser may also be subject to legal liability for his or her actions under state or federal anti-discrimination laws.

No Retaliation

Any employee, volunteer, job applicant or contractor bringing a sexual harassment or other harassment complaint or assisting in investigating such a complaint will not be retaliated against, adversely affected in the terms and conditions of employment, or discriminated against in any way because of the complaint. Any complaints of such retaliation will be promptly investigated and appropriate action will be taken.

Complaint Procedure and Investigation

It is the Center's intention to provide assistance to any employee who feels uncomfortable or harassed due to the conduct of others in the workplace. Any complaints regarding sexual harassment, any other harassment, or retaliation for reporting or participating in an investigation should be directed to the Center's Executive Director. All complaints shall be handled as confidentially as possible. If for any reason an individual does not wish to confide in the Executive Director directly, he or she may contact the chair of the Chair of the Board. Because of the Center's commitment to this policy, the Center also encourages anyone who witnesses conduct that he or she believes to be in violation of this policy to report that conduct to for investigation.

IMPROPER OR ILLEGAL ACTIVITY

The Center encourages its employees and volunteers to report suspected or actual illegal or improper activity, financial or otherwise. The Center will not condone any activity that is illegal or improper, whether done by a board member, volunteer or employee. Employees should report to the Executive Director or the President of the Board any activities that believed to be illegal or improper. Reports may be made on a confidential and/or anonymous basis. The Center will review the complaint and take any other action it deems appropriate. Employees will be protected against retaliatory actions resulting from reporting such activities. Any employee who feels that adverse action has been taken toward him/her due to a report of illegal or improper activity should notify the Executive Director or the Chair of the Board as soon as possible.

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