

Workplace and Sexual Harassment

Purpose

This procedure affirms the Boeing Employee Tennis Club's (hereafter known as the Club) commitment to providing an environment that is free from harassment, including sexual or sex (gender)-based harassment. Harassment of any kind will not be tolerated by employees, members, visitors or others.

This procedure does not constitute a contract or contractual obligation, and the Club reserves the right, in its sole discretion, to amend, modify, or discontinue its use without prior notice, notwithstanding any person's acts, omissions or statements to the contrary.

Approved By

Stuart Thompson
Chair, Human Resources Board

1. Club Commitment

The Club is committed to creating an environment where everyone is treated fairly with trust and respect. This commitment is consistent with our enduring values of trust, respect, diversity and inclusion. BETC is committed to maintaining an environment that is free of discrimination and harassment, including sexual or sex (gender) – based harassment. Harassment not only violates our policy but also may be a violation of federal or state law.

2. Objectives

- A. Communicate the Club commitment to fostering a work environment free from harassment, including sexual or sex (gender) – based harassment.
- B. Define conduct prohibited by this procedure.
- C. Provide examples of conduct that may be deemed inappropriate under this procedure.
- D. Communicate the process for reporting alleged incidents of harassment, including sexual or sex (gender) – based harassment.
- E. Confirm the guidelines for investigating alleged incidents of harassment, including sexual or sex (gender) – based harassment.
- F. Describe processes for responding to harassment complaints, including sexual or sex (gender) – based harassment complaints that are reasonably calculated to end the inappropriate behavior and prevent it from recurring.
- G. Confirm that corrective action up to and including cancellation of membership and a lifetime ban from entering the Club will be imposed for conduct deemed to be in violation of this procedure.

3. Definitions

The definitions of the following terms used in this procedure are for purposes of this procedure only and have no effect on the meaning of the same or similar terms used in other documents or procedures.

- A. Harassment: Any verbal, written, graphic, or visual communication or physical conduct that shows hostility or aversion toward an individual (or group) because of his/her race, color, religion, national origin, gender, sexual orientation, gender identity, age, physical or mental disability, genetic factors, veteran/military status or any other EEO-related status protected under federal, state, and local laws that (1) has the purpose or effect of unreasonably interfering with the performance of work; (2) has the purpose or effect of creating a hostile, intimidating, or offensive Club environment; or (3) adversely affects employment opportunities.

Conduct can violate this procedure without violating any federal, state or local law or without specifically causing the impacts described in the paragraph above.

- B. Sexual harassment: Unwelcome sexual advances, requests for sexual favors or other verbal or physical acts of a sexual nature when:
1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
 2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
 3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating a hostile, intimidating or offensive Club environment.
- C. Sex (gender) – based harassment: Unwelcome comments or conduct because of an individual's sex (gender) or said about a particular sex (gender) which unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive Club environment. In contrast to sexual harassment, these comments do not have to be sexual in nature.
- D. Retaliation: Adverse action(s) against a person because the person has made or is perceived to have made a complaint, participated in an investigation, given information regarding possible violations of company policy, or reported an alleged wrongdoing through formal channels. Examples of retaliation include, but are not limited to, negative social media or gossip about the individual, Club members or employees or any specific group of members.

Conduct can violate this procedure without violating any federal, state or local law or without specifically causing the impacts described in the paragraph above.

4. Requirements

- A. Examples of Harassment
1. Harassment can occur as a result of one sufficiently egregious incident or from a series of incidents.
 2. Harassment can occur as a result of the conduct by employees, members, visitors, or others who enter the Club.

3. Examples of conduct that may violate this procedure include, but are not limited to the following:
 - a. Written or graphic communications (e.g., graffiti, letters, cards, notes, invitations, electronic messages, symbols or writing on white boards or clothing) that a reasonable person would consider offensive.
 - b. Verbal communication (e.g., offensive language, slurs, banter, and jokes) that a reasonable person would consider offensive.
 - c. Threats, intimidation, or aggressive acts toward an individual or group.
 - d. Visual displays (e.g., gestures or the displaying of objects, pictures, cartoons, or posters) including images displayed on computer monitors or other electronic devices that a reasonable person would consider offensive.

B. Examples of Sexual Harassment

1. Sexual harassment can occur as a result of one sufficiently egregious incident or arise from a series of incidents.
2. Sexual harassment can occur as a result of conduct by employees, members, visitors, or others who enter the Club.
3. Examples of conduct that may violate this procedure include, but are not limited to the following:
 - a. Unwanted and repeated requests for dates.
 - b. Sexual advances or requests for sexual favors.
 - c. Employment decisions based on an employee's submission to or rejection of sexual advances.
 - d. Sexual gestures, displaying sexually suggestive objects, pictures, cartoons, or posters, including images displayed on computer monitors or other electronic devices.
 - e. Sexually explicit language, derogatory comments, slurs, jokes, or innuendos.
 - f. Suggestive or obscene written communication, (e.g., letters, notes, invitations, or e-mail messages).
 - g. Unwanted physical contact, including touching, kissing, hugging, or intimidating movements.
 - h. Sexually related comments about an individual's body.

C. Examples of Sex (gender) – based Harassment

1. Derogatory and stereotypical comments about members of a particular sex (gender).
2. Repeatedly demeaning or criticizing an individual because of his/her sex (gender).
3. Inappropriate and repeated use of terms of endearment.

4. Sabotaging or interfering with any other individual because of her/his sex (gender).
5. Threatening or intimidating an individual because of her/his sex (gender) through the use of hostile or threatening words and/or behaviors.

D. Complaint Procedure

1. Employees and members are expected to report any conduct that they believe violates this procedure. They may report it to Club management or a Board Member.
2. Complaints of alleged harassment, including sexual or sex (gender) – based harassment, are received and investigated as confidentially as possible consistent with the need to conduct a full investigation.

E. Investigation

1. Complaints of alleged harassment, including sexual or sex (gender) – based harassment, (as defined in this procedure) are investigated by the Board HR Committee and the Club Director

F. Prohibition Against Retaliation

1. The Club does not tolerate retaliation against employees or members for filing a complaint of harassment, including sexual or sex (gender) – based harassment, for bringing such conduct to the Club's attention, or for providing information related to such complaints.
2. Retaliation is a serious violation of this procedure and should be reported immediately.
3. Any person found to have retaliated against an employee or member for filing a harassment complaint, including a sexual or sex (gender) – based harassment complaint, or for providing information during an investigation will be subject to corrective action, up to and including discharge.

G. Corrective Action

Corrective action will be imposed for conduct deemed to be in violation of this procedure by the BETC Board HR Committee up to and including cancellation of membership and a lifetime ban from entering the Club premises

5. Responsibilities

A. Employees

1. Not engage in conduct that may be inappropriate or violates the provisions of this procedure.
2. Report conduct that they believe may violate this procedure to their management or a BETC Board member

B. Members and Guests

1. Not engage in conduct that may be inappropriate or violates the provisions of this procedure.

2. Report conduct that they believe may violate this procedure to their management or a BETC Board member

C. Managers

1. Not engage in conduct that violates the provisions of this procedure.
2. Create an environment free of workplace harassment, including sexual or sex (gender) – based harassment by promoting BETC’s enduring values of trust, respect, and diversity and inclusion.
3. Take proactive steps to identify, prevent, and eliminate behaviors that may violate this procedure.
4. Immediately report conduct or allegations that may indicate a violation of this procedure to Board representative.
5. Fully cooperate with inquiries and investigations.
6. Administer the appropriate corrective action for conduct in violation of this procedure.

D. Human Resources Committee

1. Not engage in conduct that violates the provisions of this procedure.
2. Distribute communication to employees reaffirming the Company’s policy against harassment, including sexual or sex (gender) – based harassment.
3. Conduct and preside over inquiries and investigations.
4. Provide support to managers to ensure the administration of employee corrective action for conduct in violation of this procedure.