



Anti-Harassment Policy

1. **Statement of Philosophy.** Trout Unlimited has a longstanding commitment to a work and corporate environment that respects the dignity and worth of each individual. Inappropriate behavior and unlawful harassment create conditions that are wholly inconsistent with this commitment. The purpose of the policy set forth below is not to regulate the personal morality of employees or TU volunteers, but rather to foster an environment that is free from all forms of harassment, whether that harassment is because of race, color, gender, age, religion, national origin, sexual orientation, gender identity, marital status, disability, veteran status or any other characteristic protected by law.
2. **Discriminatory Harassment Prohibited.** Discriminatory harassment, including sexual harassment, will not be tolerated by TU. This policy applies to all forms of harassment, whether on TU premises or in any TU-related setting, including but not limited to social events, business trips, staff retreats, board meetings, or TU volunteer events. This policy applies regardless of the gender of the individuals involved. This policy covers, (a) all employees of TU, including applicants for employment; (b) volunteers at all levels of the organization; and (c) third parties, such as clients, customers, contractors and vendors, to the extent that TU has control over the individual and the conduct of the individual affects the work environment or interferes with the performance of work.
3. **Sexual Harassment Defined.** For purposes of this policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:
 - submission to such conduct is either explicitly or implicitly made a term or condition of an individual's employment; or
 - submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual; or
 - such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

Some examples of what may constitute sexual harassment are: threatening to take or taking employment actions, such as discharge, demotion or reassignment, if sexual favors are not granted; demands for sexual favors in exchange for favorable or preferential treatment; unwelcome and repeated flirtations, propositions or advances; unwelcome physical contact; whistling; leering; improper gestures; horseplay; use of stereotypes; offensive, insulting, derogatory or degrading remarks; unwelcome comments about appearance, whether positive or negative; sexual jokes or use of sexually explicit or offensive language; gender- or sex-based pranks; and the display in the workplace of sexually suggestive objects or pictures. The above list of examples is not intended to be all-inclusive, and applies not only to physical and face-to-face interactions, but also to electronic communications such as voicemail, email, text messages, blogs, and social media. Care should be taken in informal business situations, including TU parties, staff retreats, volunteer events, and business trips.

4. **Other Harassment Defined.** For purposes of this policy, other harassment is defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, gender, age, religion, national origin, sexual orientation, gender identity, marital status, disability, veteran status or any other characteristic protected by law, and that:
 - creates an intimidating, hostile or offensive work environment; or
 - unreasonably interferes with an individual's work performance.

Some examples of such harassment are: using epithets or slurs; mocking, ridiculing or mimicking another's culture, accent, appearance or customs; threatening, intimidating or engaging in hostile or offensive acts that focus on an individual's race, color, gender, religion, national origin, sexual orientation, gender identity, marital status, disability, veteran status or any other characteristic protected by law, including stereotyping, jokes, or pranks; the displaying on walls, bulletin boards or elsewhere on TU premises, or circulating in the workplace, of written or graphic material that denigrates or shows hostility or aversion toward a person or group because of race, color, gender, age, religion, national

origin, sexual orientation, gender identity, marital status, disability, veteran status or any other characteristic protected by law. The above list of examples is not intended to be all-inclusive, and applies not only to physical and face-to-face interactions, but also to electronic communications such as voicemail, email, text messages, blogs, and social media.

5. **Consensual Relationships.** Consensual romantic and/or sexual relationships between a TU employee with supervisory authority and any subordinate, including one not directly under the supervisor, will compromise TU's ability to enforce its policy against sexual harassment. Consequently, supervisors are strongly discouraged from having a consensual romantic and/or sexual relationship with a person reporting to him/her or in the direct chain of reporting responsibility. However, if such a relationship does occur, each of the employees must promptly disclose the relationship to the Executive Vice President or the Human Resources Director. If the relationship is consensual and continuing, management will take appropriate actions, including in every instance, the transfer of reporting responsibility to eliminate the direct, or indirect, chain of reporting between the individuals involved.
6. **Reporting Discriminatory Harassment.** Trout Unlimited strongly encourages the prompt reporting of all incidents of discriminatory harassment. For TU employees, if you believe you are being harassed or if you have witnessed harassing behavior towards another employee, whether by another TU employee, a TU volunteer or third-party contractor, you should report it immediately to your supervisor or, if you prefer not to advise your supervisor, report it to the Executive Vice President, Human Resources Director, General Counsel, or any member of the senior staff. As a volunteer, if you believe you are being harassed or if you have witnessed harassing behavior towards other volunteers or towards TU employees, you should report it immediately to the Vice President for Volunteer Operations or the General Counsel. If, at any time, as TU employees or volunteers, you feel it would be unreasonable to use this procedure to report harassment because of unusual or unique circumstances, TU encourages you to discuss your concerns with the Chairman of the Board of Trustees or any other member of the Board of Trustees.
7. **Investigation.** When an employee reports harassment as specified above, TU will undertake a prompt investigation appropriate to the circumstances. The steps to be taken during the investigation cannot be fixed in advance, but will vary depending upon the nature of the allegations. Confidentiality will be maintained throughout the investigative process to the extent practicable and consistent with TU's need to undertake a full investigation.
8. **Resolving the Matter.** Upon completion of the investigation, appropriate remedial action will be taken, if necessary and supported by the facts. When the charge relates to employees, remedial action may include oral or written counseling, referral to formal counseling, disciplinary suspension or probation, or termination from TU. If the charge relates to a TU volunteer, remedial action may include either referral to appropriate governmental authorities or expulsion as a member of the organization or both. If the charge relates to a third party, remedial action may include either reporting of the incident to the superiors of the person involved or referral to appropriate governmental authorities or both.
9. **Nonretaliation.** An individual who reports incidents that the individual, in good faith, believes to be violations of this policy, or who is involved in the investigation of harassment, will not be subject to reprisal or retaliation. Retaliation is a serious violation of this policy and should be reported immediately. The report and investigation of allegations of retaliation will follow the procedures set forth in this policy. Any person found to have retaliated against an individual for reporting discriminatory harassment or participating in an investigation of allegations of such conduct will be subject to appropriate disciplinary action.
10. **Training.** So that employees understand this policy and their obligations under it, TU periodically will conduct training relating to the policy and its implementation.
11. **Communication.** This policy is part of TU's overall commitment to open communication. The policy will also be published as a formal policy of the Board of Trustees of TU. Trout Unlimited encourages any employee with workplace concerns of any nature (including, but not limited to, any alleged discrimination) to bring those concerns to the attention of the Executive Vice President, or any member of the senior staff.

Board Adopted Feb. 2018