



SEXUAL HARASSMENT

1. Policy

It is the policy of Erie Water Works (EWW) that all our employees should be able to work in an environment free from all forms of discrimination, including sexual harassment. Sexual harassment is a violation of the EWW code of conduct. It is illegal and will be grounds for discipline, up to and including termination.

2. Definition

The Erie Water Works adopts the definition of the Equal Employment Opportunity Commission ("EEOC") for sexual harassment:

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitutes sexual harassment when:

- (1) submission to such conduct is made, either explicitly or implicitly, a term or condition of your employment,
- (2) submission to rejection of such conduct is used as the basis of employment decisions affecting you, or
- (3) such conduct has the purpose or the effect of unreasonably interfering with your performance or creating an intimidating, hostile, or offensive working environment.

This includes, but is not limited to:

- (1) Unwelcome or unwanted advances or touching, and offensive sexual flirtations, comments, advances, and propositions.
- (2) Graphic commentaries about a person's body or appearance, such that they go beyond courtesy.
- (3) Display in the workplace of sexually suggestive objects or pictures.
- (4) Verbal or written abuse of a sexual nature, including telling "dirty jokes" if they are unwanted and considered offensive; tasteless, sexually oriented comments, innuendos or actions which offend another employee.
- (5) Comments that denigrate or show hostility toward an individual because of sexual orientation or gender identity or expression.

Sexual harassment also includes intimidating or hostile acts that are not sexual in nature, if they are directed toward employees merely because of their gender.

Sexual harassment is prohibited against members of the same sex as well as against members of the opposite sex.

Sexual harassment is particularly offensive when engaged in by any supervisor or person in authority. A supervisor or any other member of management who conditions any hiring, promotion, scheduling, evaluation, disciplinary or other job-related decision on submission to advances or participation in such activities will be disciplined appropriately.

3. Procedure for Complaints

Any employee who feels he or she has experienced (or has witnessed) discrimination because of his or her gender, or has been subjected to sexual harassment by a co-employee, supervisor, agent of EWW, outside tradesman, or a customer of the EWW, should immediately report such incident or incidents to the Human Resources Director. If you do not feel comfortable reporting this matter to the Human Resources Director, you may report directly to the Chief Executive Officer.

All information will be held in strict confidence and will be disclosed only on a need-to-know basis if necessary for the investigation and resolution of the matter. EWW will not use the information against the person who makes a good faith allegation of sexual harassment. However, because false accusations have serious effects on the lives of innocent people, disciplinary action will be taken if the accusation of sexual harassment proves to be false and not made in good faith.

In determining whether the alleged conduct constitutes sexual harassment, the totality of the circumstances, the nature of the harassment, and the context in which the alleged incident or incidents occurred will be investigated. The investigation will be undertaken promptly.

Any employee, supervisor or agent found by EWW, after an appropriate investigation, to have sexually harassed an employee will be subject to appropriate sanctions depending on the circumstances. All EWW employees, including supervisory personnel, must be aware that sexual harassment may be grounds for immediate termination.

The EWW is dedicated to maintaining a working environment free of discrimination and based on professionalism. We expect that all employees will continue to act responsibly to fulfill the EWW’s commitment to working in such an environment. Any employee should not hesitate to speak to the Human Resources Director concerning any form of discrimination or harassment.

4. Policy Approval

Approved By:	Craig Palmer, CEO
Revision History:	Version 1.2, Revised October 25, 2024
	Version 1.1, Revised April 1, 2006
	Version 1.0, Approved February 16, 1995



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Your signature on this form indicates that you have received a copy of, and understand, the Erie Water Works SEXUAL HARASSMENT POLICY.

I hereby acknowledge that I have been informed of, understand, and received a copy of the Erie Water Works Sexual Harassment Policy.

Signature

Date