

EQUAL EMPLOYMENT OPPORTUNITY

SCOPE

This policy addresses Project Kompass's commitment to providing equal opportunity employment for all employees and applicants and to promoting diversity and inclusion in the workplace. Project Kompass complies with all federal and state equal employment opportunity laws in all hiring and employment practices, the Corporation does not discriminate against employees and applicants.

Project Kompass is committed to enhancing our diversity and demonstrating that commitment to our staff, community and our residents. The Corporation promotes diversity by developing policies, programs, and procedures that foster a work environment in which differences are respected and valued including:

- Recruitment
- Employment
- Promotions
- Transfers
- Training
- Working conditions
- Wages and salary administration
- Employee benefits and application of policies

PROMOTING DIVERSITY

Diversity refers not only to race and gender, but also to an array of human differences, including culture, socio-economic background, experience, and perspective that exist in the workforce and the wider community. Project Kompass believes that promoting diversity plays an essential role in its mission to attract the widest pool of qualified applicants to its work force, and enhancing our relationships with the community and the residents of Project Kompass.

DISSEMINATION AND IMPLEMENTATION OF POLICY

EQUAL EMPLOYMENT OPPORTUNITY (cont.)

The Executive Director of Project Kompass will be responsible for the dissemination of this policy. The Executive Director and staff members are responsible for implementing equal employment practices within the Corporation.

Procedures

Project Kompass administers our EEO policy fairly and consistently by:

- Posting all required notices regarding employee rights under EEO laws in areas highly visible to employees.
- Advertising for job openings with the statement "***Project Kompass is an equal opportunity employer. All qualified applicants will receive consideration for employment without regard to race, color, age, sex, religion, sexual orientation, gender identity and/or expression, national origin, disability status, protected veteran status, or any other characteristic protected by law.***"
- Forbidding retaliation against any individual who files a charge of discrimination, opposes a practice believed to be unlawful discrimination, reports harassment, or assists, testifies or participates in a company or EEO agency proceeding.
- Posting all required jobs with the appropriate state agencies.
- Requiring employees to report to the Executive Director any apparent discrimination or harassment. The report should be made within 48 hours of the incident or as soon as practically possible.
- Promptly notifies the general counsel of all incidents or reports of discrimination or harassment and takes other appropriate measures to resolve the situation.

HARASSMENT

Harassment is a form of unlawful discrimination and violates Project Kompass's policy. Unlawful sexual harassment is defined as unwelcome sexual advances, request for sexual favors and other verbal or physical conduct 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 individuals.
3. Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

4. Harassment also includes unwelcome conduct that is based on race, color, religion, sex (including pregnancy), national origin, age, disability or genetic information. Harassment becomes unlawful where:

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5. Enduring the offensive conduct becomes a condition of continued employment, or
6. The conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

Project Kompass encourages employees to report all incidents of harassment to the Executive Director (Ronnie Hoey) or a member of the Project Kompass team. Project Kompass maintains and enforces a separate policy on harassment prevention, complaint procedures and penalties for violations.

Violations of this policy, regardless of whether an actual law has been violated, will not be tolerated. Project Kompass will promptly, thoroughly and fairly investigate every issue that is brought to its attention in this area and will take disciplinary action, when appropriate, up to and including termination of employment.

Ronnie Hoey
Executive Director
Project Kompass
83 Middlesex Street North
Chelmsford, MA 01863
(978) 710 - 4225

STATE AND FEDERAL REMEDIES

While employees are encouraged to report claims internally, if an employee believes that he or she has been subjected to harassment, the employee may file a formal complaint with either or both of the government agencies listed below within their mandated timeframes.

Massachusetts Commission Against Discrimination (MCAD)
One Ashburton Place, Room 601
Boston, MA 02108
617 727-3990

United States Equal Employment Opportunity Commission (EEOC)
One Congress Street, 10th Floor
Boston, MA 02114
617 565-3200

Project Kompass does not discourage or obstruct employees and applicants from filing complaints with the federal Equal Employment Opportunity Commission or state EEO agency.

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