

NORFOLK COUNTRY CLUB
POLICY AGAINST WORKPLACE DISCRIMINATION AND
HARASSMENT AND UNLAWFUL PRACTICES

Dated: December 15, 2012

ANTI-HARASSMENT POLICY

The Norfolk Country Club is committed to maintaining a workplace free from discrimination and harassment (sexual or otherwise). The Club does not accept, condone or tolerate actions of discrimination or harassment by any Employee, Member, Guest, or Vendor. The Club is committed to equal opportunity for all without regard to sex, race, color, ethnicity, national origin, citizenship, age, veteran's status, marital status, sexual orientation, religion or disability or any other personal trait protected by federal, state or local law. All Employees, Members and Guests must comply with this policy and take appropriate measures to ensure that such conduct does not occur. Violations of this policy may result in disciplinary action for Employees or Members up to and including termination of Employment or loss of Membership.

Harassment involves behavior that may include illegal conduct, personally offensive or demeaning conduct, or failure to respect the rights of others. Such harassing conduct lowers morale and, therefore, interferes with our work effectiveness and the mission of the Club. Harassment may take different forms, and may involve, but is not limited to, visual displays, suggestive remarks or jokes, gestures, sexual demands, verbal or written propositions, or unwanted physical contact. Whatever form it takes, the Club will not tolerate any Employee, Member, Guest or Vendor to illegally harass others with whom he/she has business or Club interactions, including but not limited to other Employees, Members, Guests, and Vendors. Whatever form it takes, harassment is insulting and demeaning to the recipient and will not be tolerated in the Club.

Sexual harassment is unwelcome, unsolicited conduct of a sexual nature or because of one's sex that the recipient regards as undesirable or offensive. It includes unwelcome sexual advances, requests for sexual favors, and any other conduct of a physical, verbal, or non-verbal nature (including degrading comments, offensive pranks, or sexually suggestive pictures) where:

- submission to such conduct is either an explicit or implicit condition or term of employment; or
- submission to and/or rejection of such conduct is used as a basis for employment, membership decisions or business decisions affecting the individual in question; or
- such conduct unreasonably interferes with an employee's work performance; or a member's enjoyment of the Club, or
- such conduct has the effect of creating an intimidating, hostile or offensive work or Club environment.

To fully protect our Employees' and Member's rights, the Club has established a complaint procedure specifically designed to allow for an investigation and resolution of all harassment claims. Anyone who believes that they have been subjected to harassment should report their concerns to any member of the NCC Management or any Board Member or Committee chairperson. No retaliatory measures will be taken against any Employee who complains of harassment or who cooperates in a harassment investigation. Under no circumstances need any Employee report harassment to a person whom he or she is accusing of inappropriate behavior

Sexual Harassment complaints will be treated confidentially to the maximum extent possible. However, investigations of such complaints will generally require disclosure to the accused individual and to other witnesses in order to gather pertinent facts. At the conclusion of its investigation, the Club will take whatever action it believes is warranted under the circumstances, including but not limited to:

- (i) For Employees: training, referral to counseling, warning, reassignment, demotion or termination of employment;
- (ii) For Members or Guests: At the conclusion of its investigation, the Club will take whatever action it believes is warranted under the circumstances, including but not limited to, warnings, suspensions, or revocations of privileges or Membership, pursuant to Club Bylaws.

END OF POLICY