



**WESLEY WOODS**  
SENIOR LIVING

## EEO and Discriminatory Harassment

**THIS POLICY**

Policy Number: 201

Last Reviewed: 05/29/2025

**REPLACES POLICY**

Policy Number: 201

Effective Date: 05/29/25

**STATEMENT:**

Wesley Woods Senior Living will make all employment decisions (including decisions about recruitment, hiring, promotion, transfer, demotion, evaluation, discipline, compensation, benefits, training, and termination) without regard to race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status, or any other characteristic classification protected by federal, state or local law. Wesley Woods will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship.

Wesley Woods does not and will not permit unlawful discriminatory practices, sexual harassment, or harassment based on race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status, or any other characteristic or classification protected by applicable law. Employees and their work environment should be free from all forms of unlawful harassment, discrimination, and intimidation. Wesley Woods will provide persons with disabilities an equal opportunity to participate in and benefit from programs and services as afforded to other individuals.

Wesley Woods Senior Living will not tolerate illegal discrimination or harassment in any form, whether supervisors, employees, or non-employees commit it. All supervisors will be responsible for preventing and eliminating discrimination and harassment, including sexual harassment. Wesley Woods will promptly investigate any allegation of discrimination and harassment. If determined that discrimination or harassment has occurred, Wesley Woods will take appropriate disciplinary action, including the offending person's discharge.

**A. Discriminatory Harassment of a Sexual Nature**

Sexual harassment includes unwelcome conduct, based on sex or gender stereotypes, when:

- Submission to such conduct is made either explicitly or implicitly to an individual's employment or;
- Submission to or rejection of such conduct is used as a basis for employment or;
- Such conduct is so severe and/pervasive it has the purpose or effect of unreasonable interfering with a person's employment or performance that a reasonable person would find intimidating, hostile or offensive.

Depending upon the severity and/or pervasiveness of the conduct, sexual harassment may include, for example, subjecting a person to egregious, unwelcome sexual attention, physical or verbal advances, sexual flirtations or propositions, vulgar talk or jokes, degrading graphics materials, or verbal comments or a sexual nature about an individual or his or her appearance, or the display of sexually suggestive objects outside a scholarly context and purpose.

Sexual harassment includes sexual misconduct, sexual violence, sexual assault, intimate partner violence, stalking, and gender-based bullying. Sexual harassment also includes verbal, physical, or expressive conduct that denigrates or shows hostility or aversion toward an individual or group



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based on gender or sex. Prohibited sexual harassment includes an attempt to coerce an unwilling person into a sexual relationship; to punish a refusal to comply with a sexual based request; to condition a benefit on submitting to sexual advances, and to make direct or implied threats that submission to sexual advances will be a condition of employment opportunity. Sexual harassment may also occur in the form of unwelcome sexually suggestive cartoons, pictures, emails, texts, tweets, videos, or other graphic materials that may contribute to a hostile working environment.

### **B. Discriminatory Harassment of a Non-Sexual Nature**

Wesley Woods policy prohibits discriminatory harassment of a non-sexual nature, which includes verbal, physical, or expressive conduct that denigrates or shows hostility or aversion toward an individual or group based on race, color, religion, ethnic or national origin, gender, genetic information, age, disability sexual orientation, gender identity, gender expression, veteran's status, or any factor that is a prohibited consideration under applicable law, and that is so severe and/pervasive it:

- Has the purpose or effect of creating an intimidating, hostile or offensive environment **or**
- Has the purpose or effect of unreasonably interfering with an individual's work performance.

Based on its severity and pervasiveness, the prohibited behavior may include: conduct or material (physical, oral, written, graphic, electronic messages, or media posted or circulated in the communities) involving epithets, slurs, negative stereotyping, threatening, intimidating, or hostile acts, that serve no purpose or show hostility or aversion toward an individual or group because of race, color, religion, ethnic or national origin, gender, genetic information, age, disability, sexual orientation, gender identity, gender expression, veteran's status, or any factor protected by applicable law.

### **C. Complaints against vendors, Contractors and Third Parties**

Wesley Woods' commitment to providing employees with a working environment free of discriminatory harassment includes freedom from inappropriate conduct by vendors, contractors (temporary employees), and third parties. If a Wesley Woods employee believes he or she has been a victim of misconduct in violation of this policy by a vendor, contractor, or third party they should report such conduct immediately to their supervisor or the Human Resources Director. Wesley Woods will take prompt action to investigate the complaint and correct any inappropriate conduct found to have occurred.

### **D. Reporting Procedure:**

Any employee who believes that he or she is being or has been harassed or discriminated against in violation of this policy should promptly go to his/her immediate supervisor and, orally or in writing, state the specific details of the sexually harassing, discriminatory, or other type of harassing behavior. Harassment violations will be reported of employees by customers, residents, volunteers, or vendors. If it is difficult or uncomfortable for the employee to discuss such a matter with his/her supervisor (or if the harassment involves the supervisor), the employee should report the incident to the next highest level of management or the Human Resources Department. Harassment by employees of customers, residents, volunteers, or vendors is prohibited and may violate this policy.

Any employee who becomes aware of harassment of a resident or vendor by an employee should contact the V.P. of Operations or the Human Resources Department. Appropriate action will be taken against anyone suspected of harassment.



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Wesley Wood's policy is to listen to all complaints, investigate with due regard for confidentiality, and quickly apply proper sanctions to end any offensive behavior. Employees are required to cooperate fully with any investigation of harassment or discrimination. Sanctions for engaging in discrimination, harassment will depend upon the incident's facts and circumstances.

**E. Prohibition Against Retaliation**

Wesley Woods Senior Living will not retaliate against any employee because of reports of alleged harassment or discrimination or cooperation with any investigation. Any employee who believes retaliation has resulted from either reporting a complaint of harassment or discrimination or participation in an analysis of such allegations should immediately report this to their supervisor or the Human Resources Department.

**F. False Accusations**

Anyone who knowingly makes a false accusation of discrimination, harassment, or retaliation will be subject to appropriate sanctions. However, failure to prove a claim of discrimination, harassment, or retaliation does not constitute proof of a false accusation.

***Approved By:***

*Terry Barcroft, President/CEO*

*Doris Billingsley, VP Human Resources*

*Wesley Woods Senior Living Board of Directors*