Sexual Harassment Policy

Sexual harassment, whether committed by supervisory or non-supervisory personnel or a patient, is specifically prohibited by Company policy. Sexual harassment is defined as any unwelcome sexual advances, requests for sexual favors or any other verbal, visual 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;
* submission to or rejection of such conduct is used as the basis for an employment decision affecting such individual; or
* such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

This policy applies equally to men and women, to same and opposite-sex relationships, to supervisor-subordinate relationships, and to peer relationships. It also applies to non-employees, such as patients, vendors and other visitors.

The Company and its management are responsible for taking immediate action against any act of sexual harassment by any employee. Although it would be impossible to list all conduct that would violate the Company’s harassment policy, the following are examples of conduct that the Company absolutely prohibits:

* Unwelcome sexual flirtations, advances, propositions, insinuations or physical contact
* Profane, inappropriate, lewd and/or demeaning language
* Verbal comments, inquiries, remarks or actions which are offensive or derogatory in nature including any reference to another person’s gender, sexual preference, marital status or other any other classification protected by federal, state or local law
* Transmitting or forwarding e-mails containing offensive, suggestive or lewd attachments, statements or jokes
* Displays of objects or materials which are, or may be perceived as offensive or inappropriate in the workplace, including anything sexually suggestive or insulting to fellow employees
* Threats or insinuations from supervisory personnel either stated or implied, that suggest an employee’s submission to sexual requests will impact their employment and/or wages either positively or negatively

The above examples are only illustrative types of conduct that would violate this policy and, as such, do not represent a complete list. All employees must comply with this policy and take appropriate measures to ensure that sexual harassment does not occur. Individuals who engage in acts of sexual harassment may be subject to disciplinary action, up to and including termination of employment.

**Reporting Procedure**

An employee who believes that he or she has been subject to harassment, even if the employee is unsure if the conduct violates the Company’s harassment policy, should immediately report such conduct to his or her Supervisor; if this is not appropriate, employees are urged to seek the assistance of the Director of Human Resources or any other member of management with whom the employee feels comfortable. Also, any employee who witnesses harassment, has the responsibility to report such actions immediately either to his or her Supervisor, the Director of Human Resources, or any other member of management with whom the employee feels comfortable.

If the employee feels that the matter is not being addressed adequately or promptly, he or she should promptly bring it to the attention of the next level of management or Human Resources.

Employees who believe they have experienced impermissible harassment have an obligation to take advantage of this complaint procedure. The Company urges the prompt reporting of complaints so that quick and constructive action can be taken.

**Investigation Procedure**

The Company will promptly, thoroughly and impartially investigate all bona fide complaints. Employees are encouraged to respond to questions and participate in investigations. Complaints and information obtained during investigations will be kept confidential to the extent possible consistent with the necessity to investigate the complaint and take the appropriate corrective action.

Any Supervisor who receives a complaint of harassment from an employee, regardless of whether it is a “formal” or “informal” complaint, or who learns of an incident, must forward the information immediately to the Director of Human Resources.

Violations will be dealt with promptly, appropriately and proportionately. Responsive action may include training, reprimand, warning, reassignment, suspension or termination, as the Company believes is appropriate under the circumstances following its investigation.

**No Retaliation**

Retaliation against an employee who reports an alleged violation of this policy or who provides information in any related investigation or proceeding is strictly prohibited, will not be tolerated and shall constitute a violation of this policy. Alleged victims of harassment and individuals who in good faith report harassment or participate in investigations will be protected from retaliation. Retaliatory conduct should immediately be reported to the Director of Human Resources so that the Company can take prompt and appropriate action.

General Non-Harassment Policy

It is Company’s policy to prohibit discrimination against or harassment of any employee by a supervisor, employee, client/customer, patient or visitor on the basis of race, religious creed, religion, color, sex, national origin, age, citizenship, ancestry, veteran status, disability, sexual orientation, alienage, familial status, domestic violence victim status, genetic predisposition, marital status or any other characteristic prohibited by federal state or local law.

Harassment is not necessarily sexual in nature. Prohibited harassment can take many forms: slurs or other derogatory comments, objects, pictures, cartoons, demeaning gestures, signs, jokes, e-mail, pranks, intimidation and threats, physical contact or violence, and other conduct based upon a protected category. Such conduct violates this policy, even if it is not unlawful. Because it is difficult to precisely define harassment, employees are expected to behave at all times in a professional and respectful manner.

Anyone who feels that he or she has been subjected to conduct which violates this policy should immediately report the matter to his or her supervisor, or any member of senior management with whom you feel comfortable. If you are unsure of to whom to raise an issue of harassment, or if you have not received a satisfactory response within (5) business days after reporting any incident of what you perceive to be harassment, please immediately contact the Director of Human Resources (or anyone else in a management position with whom you feel comfortable) who will ensure that an investigation is immediately initiated.

Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate. Violation of this policy will result in disciplinary action, up to and including discharge. In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct or who cooperate in the investigation of such reports in accordance with this policy. Retaliation is unlawful. Any form of retaliation in violation of this policy will result in disciplinary action, up to and including discharge.