

Policy Against Sexual & Other Harassment

OASIS is committed to a work environment in which all individuals are treated with respect and dignity. Each employee has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, OASIS expects that all relationships among persons in the workplace will be professional and free of bias, prejudice and harassment.

It is the policy of OASIS to ensure equal employment opportunity without discrimination or harassment on the basis of all protected characteristics under the law, including but not limited to race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status and status as a covered veteran.

OASIS is committed to maintaining a workplace free of harassment, and to taking action to end such behavior if it occurs. Employees are responsible for respecting the rights of OASIS's employees, clients, interns, volunteers and guests by refraining from harassing conduct and for promptly reporting actual or potential violations of this policy.

Harassment Defined

Harassment on the basis of any characteristic or status protected by law is strictly prohibited. Under this policy, harassment includes speech (either verbal or written) or conduct that denigrates or shows hostility or aversion toward an individual or group of people on the basis of race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, military or veteran status, marital status, citizenship status, genetic information or status as a member of any group protected by law, and that a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; b) has the purpose or effect of unreasonably interfering with an individual's work performance; or c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes using epithets, slurs or negative stereotyping; engaging in threatening, intimidating or hostile acts; telling denigrating jokes; and sharing written or graphic material that denigrates or shows hostility or aversion toward an individual or group on walls or elsewhere on OASIS's premises or circulated in the workplace, on OASIS's time or using OASIS's equipment via e-mail, phone (including voice messages), text messages (or SMS), tweets, blogs, social networking sites or other means.

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment includes unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature under any of the following conditions: a) when submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; b) when submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or c) when such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

No supervisor or other employee shall threaten or insinuate, either explicitly or implicitly, that another employee's or applicant's refusal to submit to sexual advances will adversely affect that person's employment, work status, evaluation, wages, advancement, assigned duties, work shifts, or any other condition of employment or career development. Similarly, no employee shall promise, imply or grant any preferential treatment for another employee or applicant for engaging in sexual conduct. Neither

submission to, nor rejection of, sexual advances will affect an employee's terms or conditions of employment.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to:

- Unwanted sexual advances or requests for sexual favors;
- Sexual or derogatory jokes, comments, or innuendo;
- Unwelcomed physical interaction;
- Insulting or obscene comments or gestures;
- Offensive email, voicemail, or text messages;
- Suggestive or sexually explicit posters, calendars, photographs, graffiti, or cartoons;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct that includes leering, making sexual gestures, or displaying of sexually suggestive objects or pictures, cartoons or posters;
- Verbal sexual advances or propositions;
- Physical conduct that includes touching, assaulting, or impeding or blocking movements;
- Abusive or malicious conduct that a reasonable person would find hostile, offensive, and unrelated to the Organization's legitimate business interests; or
- Any other visual, verbal, or physical conduct or behavior deemed inappropriate by OASIS.

OASIS will not permit any employee, regardless of gender/gender identity, to sexually harass another employee in any way. OASIS will not tolerate such activity from anyone, including all levels of employees (supervisors and non-supervisors alike), applicants for employment, interns (whether paid or unpaid), volunteers, contractors, vendors and visitors. Sanctions will be enforced against individuals engaging in sexual harassment, as well as against supervisory and management employees who knowingly allow such behavior to continue, up to and including termination of the employment or contracting relationship. The prohibition against sexual harassment applies with equal force where the harasser and the victim are of the same gender/gender identity.

Investigations and Enforcement

OASIS encourages the prompt reporting of complaints or concerns. Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. Any employee, volunteer, intern, or third party providing services in the workplace who believes that he or she has been subject to any prohibited forms of retaliation or harassment, including sexual harassment, or who witnesses or otherwise becomes aware of others being subjected to such conduct, is expected to promptly (ideally, within 24 hours) report the incident(s) to his or her immediate supervisor, to Stacie Soto, or other designee, or on the attached Complaint Form.

In accordance with applicable law, a complaint form is provided with this policy; however, employees are not required to use that form in order to bring a matter to OASIS's attention. Rather, an employee may lodge a complaint verbally as described above or in writing, in any manner sufficient to provide notice to OASIS of the employee's concerns.

Additionally, OASIS encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcomed and request that it be discontinued. Often, this action alone will resolve the problem.

Supervisors and managers who receive a complaint of, or otherwise learn of, information that suggests this policy may have been violated are required to promptly (ideally, within 24 hours) forward that complaint to Human Resources, and will be subject to discipline if they fail to do so.

After receiving notification of a complaint, OASIS will promptly and thoroughly investigate the complaint, including by interviewing employees with information relevant to the complaint. If OASIS determines that documents, e-mails or phone records exist that are relevant to the allegations, it will take steps to obtain, review and preserve them. OASIS will keep complaints confidential to the extent possible while still fulfilling its obligation to investigate and end any harassing conduct. Employees must cooperate and provide truthful and complete information in an investigation. To maintain workplace safety and the integrity of its investigation, OASIS may suspend employees, either with or without pay, pending the outcome of the investigation.

If OASIS determines that an employee's conduct has violated this policy, it will take steps to ensure the conduct is effectively addressed. Violations of this policy will be considered a form of employee misconduct, and any employee found to have harassed another individual in violation of this policy will be subject to appropriate disciplinary action, up to and including termination of employment. Any supervisor or manager who knowingly allows harassment to continue will likewise be subject to appropriate disciplinary action, up to and including termination of employment.

Employees who make bad-faith false complaints of harassment, discrimination or retaliation may be subjected to appropriate disciplinary action, up to and including termination.

Policy Against Retaliation

Retaliation against an individual for reporting harassment or discrimination, or for testifying or assisting in any investigation or proceeding related to a claim of harassment or discrimination, is a serious violation of OASIS's policy and, like harassment or discrimination itself, will be subject to disciplinary action up to and including termination. Prohibited retaliation includes any adverse employment action, including but not limited to discharge, discipline or demotion, motivated by the employee's lodging of a good-faith complaint, participation in the investigation of such a complaint, or opposition to incidents of workplace harassment. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Please note that an adverse employment action is not retaliatory merely because it occurs after an employee reports harassment or assists in an investigation. An adverse employment action is not retaliatory unless it was motivated by the employee's report of harassment or participation in an investigation. After having reported harassment or assisted in an investigation, employees continue to be subject to OASIS's workplace policies, procedures and expectations. Employees who report harassment or assist in an investigation will not be immune from corrective action motivated by legitimate factors unrelated to retaliation.

Additional Resources

While these policies are intended to curb inappropriate behavior before it constitutes a violation of applicable law, harassment, discrimination and retaliation prohibited by this policy may also violate federal, state and/or local law. All employees have a legal right to a workplace free from unlawful harassment, including sexual harassment. In addition to the internal complaint process described in this policy, employees may also choose to pursue legal remedies with federal, state and/or local agencies, as well as to seek relief in the courts. An individual may be entitled to certain legal remedies, which can include monetary damages and/or injunctive relief, in connection with a legal or administrative action to adjudicate a claim of sexual harassment.

Among other agencies, the Federal Equal Employment Opportunity Commission, the New York State Division of Human Rights, and the New York City Commission on Human Rights, investigate and prosecute complaints of prohibited harassment, discrimination and retaliation in employment. If you think you have been harassed or discriminated against, or that you have been retaliated against for complaining or participating in an investigation, you may file a complaint with the appropriate agency. The location of the nearest office and other information can be found by visiting the agency websites, including <https://www.eeoc.gov/>; <https://dhr.ny.gov/>; and <https://www1.nyc.gov/site/cchr/index.page>.