

Policy Against Harassment

MDRT is committed to providing a work environment that is free from unlawful discrimination and harassment, including sexual harassment. Conduct that is considered to constitute harassment under this policy will not be tolerated. This policy applies both in MDRT's office and wherever else an employee's job may take him/her, as well as to all individuals who perform work on MDRT's behalf or with MDRT's employees.

Harassment Defined

For purposes of this policy, the term "harassment" is broadly defined. It includes all actions, words, jokes, comments, derogatory remarks and/or visual displays that affect an individual's work environment or employment status or tend to belittle, provoke or denigrate others, and that are based on an individual's sex, pregnancy, race, color, national origin, ancestry, ethnicity, age, religion, disability, sexual orientation, veteran or military status, genetic information, marital status, parental status, citizenship, or any other legally protected characteristic. Such conduct is considered to affect an individual's work environment or status when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of employment;
2. Submission or rejection of the conduct is used as a basis for making an employment decision; or
3. The conduct has the purpose or effect of interfering with work performance or creating an intimidating, hostile, or offensive work environment.

"Sexual harassment," in particular, is defined as any unwanted or unwelcome visual, verbal, or physical conduct of a sexual nature. Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, postings of sexual materials, uninvited touching and sexually-based or sexually-related comments. Notably, an individual need not have been physically touched or directly subject to a sexual advance or innuendo to be considered to have been harassed under this policy.

Reporting

If you experience or witness any workplace harassment, you are encouraged to report it to a supervisor, department director, the Human Resources Director or to MDRT's Chief Executive Officer. Any supervisor or manager who witnesses or becomes aware of possible harassment *must immediately* report the matter to one of those individuals. Please note that employees are encouraged to report harassment whether it occurs in our office or off-site, and regardless of the identity of the alleged harasser (be it another employee, an officer or manager, or other individual).

Investigation

All allegations of harassment will be quickly, impartially, and discreetly investigated. Information provided in the context of a harassment investigation or as part of a harassment complaint will be kept confidential to the extent possible. However, some disclosure may (and likely will) be necessary for MDRT to effect a meaningful investigation and appropriate remedy.

Employees are expected, and required, to cooperate fully with any investigation of alleged harassment. This includes participating in requested interviews, obtaining and providing requested documents or other evidence, and maintaining the confidentiality of any information requested or provided. An employee's failure to cooperate will be considered a violation of this policy.

Retaliation Prohibited

MDRT prohibits retaliation in any form. Employees can raise concerns and make reports of alleged harassment without fear of reprisal or retaliation. If an employee feels that he/she has been subject to retaliation of any kind for having made a complaint of harassment or having participated or assisted in a harassment investigation, he/she must report that retaliation pursuant to the required reporting procedure set forth above.

Disciplinary action

Any employee found to have engaged in prohibited harassment or to have retaliated against an individual for complaining of harassment or participating in an investigation, will be subject to disciplinary action, up to and including termination of employment. MDRT considers violations of this policy to be extremely serious as they undermine MDRT's basic concept of fairness and personal respect and can lead to legal and financial liability both for the violator and for MDRT.

Please contact the Human Resources Director or MDRT's Chief Executive Officer if at any time you have any questions about this policy.