

Sexual Harassment and Bystander Intervention Training Policy

Purpose

To explain the Sexual Harassment and Bystander Intervention Training process and the Harassment Complaint Policy.

Procedure

Advanced Group is partnering with Kantola to administer the annual Sexual Harassment and Bystander Intervention Training courses. Your training requirements for either or both of these trainings is dependent upon your work location.

Sexual Harassment Training Procedure:

You will be required to take the training with Advanced Group then every year or as required by state law. You will be notified by Kantola when the training is required from webprocessing@kantola.com. Please contact AGhumanresources@advancedgroup.com if you do not receive the training.

1. You will be paid for completing training up to one hour (non-manager roles) or two hours (manager roles) at your regular rate annually or bi-annually as your work state permits. It will be included in the payroll in the pay period it is completed.
2. The training must be completed at one time and cannot be split up over multiple days.
3. You will receive an email from Kantola once it is completed.
4. See below the excerpt from the Advanced Group Consultant Handbook that explains our harassment and complaint policy.

Bystander Intervention Training Procedure:

All consultants who work from the City of Chicago will also be required to complete a sixty (60) minute Bystander Intervention training course. You will be required to take the training with Advanced Group then every year. You will be notified by Kantola when the training is required from webprocessing@kantola.com. Please contact AGhumanresources@advancedgroup.com if you do not receive the training.

1. You will be paid for completing training up to one hour at your regular rate annually. It will be included in the payroll in the pay period it is completed.
2. The training must be completed at one time and cannot be split up over multiple days.
3. You will receive an email from Kantola once it is completed.
4. See below the excerpt from the Advanced Group Consultant Handbook that explains our harassment and complaint policy.

Nondiscrimination and Anti-Harassment Policy

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

It is our policy to prohibit all types of harassment, including but not limited to harassment based on: sex, race, color, age, national origin, religion, gender identity or expression, sexual orientation or sexual

preference, pregnancy or maternity, genetic information, marital status, disability, veteran status, or any other basis protected by applicable federal, state or local law. Activities of this nature are unlawful and serve no legitimate purpose; they have a disruptive effect on your ability to perform your job and they undermine the integrity of the employment relationship. Accordingly, conduct that is considered to constitute harassment under this policy, whether by an Advanced Group employee, fellow Consultant, or a customer will not be tolerated.

For purposes of this policy, the term “harassment” is broadly defined. Harassment is verbal or physical conduct relating to an individual’s sex, race, color, age, national origin, religion, gender identity or expression, sexual orientation or sexual preference, pregnancy or maternity, genetic information, marital status, disability, veteran status, or any other protected status when this conduct: (a) has the purpose or effect of creating an intimidating, hostile, or offensive working 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. Some examples of conduct that may constitute prohibited harassment include: epithets, slurs, jokes, cartoons, derogatory comments, signs, visual displays, stereotypes, statements, etc. based upon sex, race, color, age, national origin, religion, gender identity or expression, sexual orientation or sexual preference, pregnancy or maternity, genetic information, marital status, disability, veteran status, or any other basis protected by applicable federal, state, or local law.

Sexual harassment, in particular, consists of unwanted or unwelcome visual, verbal, or physical conduct of a sexual nature. Acts considered to constitute sexual harassment include, but are not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: (a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment; (b) an individual’s submission to or rejection of such conduct is used as a basis for an employment decision affecting that individual; or (c) the purpose or the effect of such conduct is to substantially interfere with the affected individual’s work performance or to create an intimidating, hostile or offensive work environment. Examples of sexual harassment include:

- a. Verbal conduct such as epithets, derogatory jokes or comments, slurs, requests for sexual favors, or unwanted sexual advances, flirtations, or propositions/invitations
- b. Visual conduct such as derogatory and/or sexually-oriented posters, photography, cartoons, drawings, gestures, or use of Advanced Group’s computer systems to send and access sexually-explicit materials
- c. Physical conduct such as unwanted touching or blocking normal movement; and/or
- d. Exchanging or offering to exchange any kind of an employment benefit for a sexual request or concession (e.g., promising a promotion or a raise in exchange for a sexual favor); or, withdrawing or threatening to withdraw any kind of an employment benefit for refusing to grant a sexual request or to make a sexual concession

An individual need not have been physically touched or directly subjected to a sexual advance or innuendo to be considered to have been harassed under this policy.



It is a violation of this policy to commit or engage in any unprofessional or inappropriate conduct based on any protected characteristic in violation of this policy, whether or not such conduct rises to the level of “unlawful” harassment.

Reporting Procedures: We take allegations of harassment very seriously. If you believe that you are the victim of harassment by anyone (including Recruiters, co-workers, customers or visitors), or if you have witnessed any conduct that may constitute a violation of this policy, you **must immediately** report it to your Recruiter. If your Recruiter is somehow involved in the harassment, or if you are uncomfortable speaking directly with your Recruiter, you **must immediately** report this matter to your HR Business Partner, any other member of Advanced Group management, the Head of HR, or the CEO. We recognize there may be circumstances when you are not comfortable reporting the issue in this manner, and in these cases, you may instead submit a report via the EthicsPoint Hotline. Reports submitted via EthicsPoint may be submitted anonymously. For more information on EthicsPoint, review the materials provided to you during onboarding or contact your Recruiter.

Recruiters **must immediately** report any incidents that they hear about or observe that may constitute a violation of this policy to their HR Business Partner, the head of HR, the CEO or another member of Company leadership with whom the individual is comfortable discussing the matter.

Similarly, if you observe acts of discrimination toward or harassment of another Advanced Group Consultant, you are **required** to immediately report this to one of the individuals listed above. You can also submit your claim in EthicsPoint at <http://advancedgroup.ethicspoint.com> or by calling 1-844-675-7683.

No Recruiter or supervisor has the authority to condition any tangible job benefit on a Consultant’s putting up with or agreeing to any conduct that may violate this policy. If a Consultant believes that they have been deprived of any job benefit or that they have been threatened, they must immediately report it to one of the individuals listed above.

Investigation Procedures: All reports and allegations of harassment will be investigated thoroughly. All employees are expected to cooperate fully in such investigations. This includes participating in interviews, obtaining and providing certain documents and/or other information, and maintaining the confidentiality of information as appropriate and requested. Information provided in the context of a harassment investigation or as part of a harassment complaint will be kept confidential, to the extent possible and practicable under the circumstances. Please note, however, that disclosure may be necessary to conduct a meaningful investigation and to fashion an appropriate remedy.

Retaliation Prohibited: Consultant may raise concerns and make reports of harassment and/or participate in the Company’s investigation of alleged harassment without any fear of reprisal or retaliation. Retaliation against any person who has complained about harassment, filed a charge of harassment, or who otherwise participated in an investigation of harassment will not be tolerated. Furthermore, no Recruiter, supervisor or officer has the authority to require you to tolerate or agree to any conduct that violates this policy in order to receive any job benefit, including compensation, duties, assignments, promotions, etc. Such activities are unlawful and will result in severe discipline, up to and



including discharge. Any concerns of retaliation must be reported immediately to HR or member of management.

Disciplinary Action: Any Consultant found to have violated this policy, including the anti-retaliation provision above, will be subject to disciplinary action, up to and including immediate termination of employment. Questions about this policy should be directed to Human Resources.

Related Documents

- Advanced Group Consultant Handbook
- Advanced Group Code of Conduct

Please acknowledge your understanding of the required Sexual Harassment Training course with Kantola and your understanding of Nondiscrimination and Anti-Harassment Policy.

Name: _____ Signature: _____ Date: _____