



**ADDISON COUNTY**  
Economic Development Corporation  
*Great starts here.*

## ACEDC POLICY

### EQUAL OPPORTUNITY AND PROHIBITION OF DISCRIMINATION AND HARASSMENT

**Purpose:** To express the policy of ACEDC regarding equal opportunity and the prohibition of harassment and discrimination, and to provide procedures for addressing complaints regarding discrimination or harassment, and to provide a procedure for reasonable accommodation.

**Policy:** Whether in matters of employment, seeking employment and in regards to all programs, services and activities offered, the Addison County Economic Development Corporation (ACEDC) shall provide equal opportunity to all individuals, groups, and businesses and prohibits discrimination or harassment of any kind based on creed, ethnicity, citizenship, sexual orientation, national origin, pregnancy, disability, marital status, political or social affiliation, age, race, color, veteran status, military status, religion, sexual orientation, domestic violence status, genetic information, gender, gender identity, gender expression or perceived gender.

It is the policy of ACEDC that all employees have the right to work in an environment free from all forms of discrimination, bullying, and harassing conduct. ACEDC expects all employees to conduct themselves in a professional manner with concern and respect for their colleagues, members, and the public.

State and Federal law prohibit, and it is the policy of ACEDC to prohibit any employee, board member, or member of ACEDC, when acting on behalf of ACEDC, to discriminate against or harass another employee, board member, member of ACEDC or member of the public because of that person's creed, ethnicity, citizenship, sexual orientation, national origin, pregnancy, disability, marital status, political or social affiliation, age, race, color, veteran status, military status, religion, sexual orientation, domestic violence status, genetic information, gender, gender identity, gender expression or perceived gender. ACEDC is committed to providing a workplace free from this unlawful conduct.

It is a violation of this policy for an employee to engage in harassment. Harassment is a form of discrimination. It includes comments, actions, or intimidation. Sexual harassment is a specific form of harassment that involves unwelcome sexual advances, request for sexual favors, or other verbal or physical conduct of a sexual nature when:

- Submission to that conduct is made either explicitly or implicitly a term or condition of employment, or
- Submission to or rejection of such conduct by an individual is used as a component of the basis for employment decisions affecting that individual; or
- The conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work or volunteer environment.

Acts and statements that seem harmless or amusing to some people may be offensive to others. While it is not possible to list all circumstances that may constitute sexual harassment, the following are some examples of conduct which may constitute sexual harassment when such conduct comes within one of the above definitions:

- Unwelcome sexual advances;
- Making threats after a negative response to sexual advances;
- Suggestive or lewd remarks or gestures;
- Unwanted hugs, touches or kisses;
- Requests for sexual favors;
- Sexually suggestive cartoons, drawings, objects, writings or e-mail messages;
- Sexual epithets, jokes and banter;
- Written or oral references to sexual conduct;
- Comments on an individual's body or sexual activity; and/or
- Leering, whistling, suggestive or insulting comments.

Further, ACEDC is committed to compliance with Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, and all other applicable laws prohibiting disability discrimination. These statutes generally prohibit discrimination against individuals with disabilities and provide that no otherwise qualified person with a disability shall be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

**Procedure: Harassment:**

Any employee, client, customer, or member of the public who believes that he or she have been the target of unlawful harassment by an employee, board member, participant in an ACEDC activity, or ACEDC contractor, or who believes he or she has been subjected to retaliation for having brought or supported a complaint of unlawful harassment, is encouraged to directly inform the offending person or persons that such conduct is offensive and must stop. If the individual does not wish to communicate directly with the alleged harasser or harassers, or if direct communication has been ineffective, then the person with the complaint is encouraged to report the situation as soon as possible to Executive Director or the Chairperson of the Executive Committee.

In the event of a complaint of unlawful harassment, or if there is reason to believe that unlawful harassment is occurring, ACEDC will take all necessary steps to ensure that the matter is promptly investigated and addressed. ACEDC is committed, and required by law, to take action if it learns of potential unlawful harassment, even if the aggrieved person does not wish to formally file a complaint.

To the extent possible, care will be taken to protect the identity of the person with the complaint and of the accused party or parties, except as is reasonably necessary to successfully complete the investigation. It shall be a violation of this policy for any employee who learns of the investigation or complaint to take any retaliatory action which affects the working environment of any person involved in this investigation.

If the allegation of unlawful harassment is found to be credible, ACEDC will take appropriate corrective action. The Executive Committee will inform the complaining person of the determination and let them know that steps have been taken to make the unlawful harassment stop. Any employee, supervisor, or agent who has

been found by the Executive Committee to have unlawfully harassed another employee, board member, or member of the public will be subject to sanctions appropriate to the circumstances, ranging from a verbal warning up to and including immediate dismissal.

If the allegation is not found to be credible, the person with the complaint and the accused person shall be so informed, with appropriate instruction provided to each, including the right of the complainant to contact appropriate state or federal agencies identified in this policy notice. Although employees are encouraged to file their complaint of unlawful harassment through this employer's complaint procedure, an employee is not required to do so before filing a charge with such agencies.

Although employees are encouraged to file their complaint of harassment through ACEDC's Complaint Process, the following agencies also process complaints of harassment:

Vermont Attorney General's Office  
Civil Rights Unit  
109 State Street  
Montpelier, VT 05609-1001  
888-745-9195 (Toll Free VT)  
802-828-3657  
802-828-3665 (TTY)  
[ago.civilrights@vermont.gov](mailto:ago.civilrights@vermont.gov)

United States Equal Opportunity Commission  
John F. Kennedy Federal Building  
475 Government Center  
Boston, MA 02203  
800-669-4000  
800-669-6820 Y)

**Procedure: Reasonable Accommodation**

A reasonable accommodation is any modification or change to a job, the work environment, or facility or procedure that will enable a qualified applicant, employee, or other person with a disability to participate in the application process or to perform essential job functions. Accommodations can include, but are not limited to: providing an alternative service such as meeting with an individual in their home or meeting at the curb to pick up or deliver an item; providing alternative formats for printed or online material; providing special communication such as interpreters or TDD phone relay. Particular to ACEDC, clients or those using ACEDC facilities, reasonable accommodation may include providing an alternative meeting location due to the inaccessibility of the ACEDC offices or alternative method to access the online loan application. To request a reasonable accommodation, please contact ACEDC Executive Director Fred Kenney at (802)777-8349 or [fkenney@addisoncountyedc.org](mailto:fkenney@addisoncountyedc.org).

Approved and Adopted by Board June 20, 2018  
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