



ADDISON COUNTY
Economic Development Corporation
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ACEDC POLICY

EQUAL OPPORTUNITY AND PROHIBITION OF DISCRIMINATION AND HARASSMENT

And

PROCEDURES FOR REPORTING HARRASSMENT AND FOR REASONABLE ACCOMODATION

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 regard to all programs, services and activities offered, the Addison County Economic Development Corporation (ACEDC) shall provide equal opportunity for, shall not discriminate against, and prohibits discrimination against or harassment of any person. Specifically, ACEDC prohibits discrimination or harassment based on an individual's race, creed, color, place of birth, ancestry, ethnicity, national origin, citizenship, religion, gender, sexual orientation, actual or perceived gender identity, gender expression, age, crime victims status, marital status, pregnancy, physical or mental disability, veteran status, military status, positive HIV-related blood test results, genetic information, and/or any other status or characteristic as defined by, and to the extent protected by, applicable state or federal law.

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, Board members, and agents to conduct themselves in a professional manner with concern and respect for their colleagues, ACEDC members, and the public.

State and Federal law prohibit, and it is the policy of ACEDC to prohibit any employee, board member, agent, or member of ACEDC, when acting on behalf of ACEDC, to discriminate against or harass another employee, board member, member of ACEDC, borrower, client, or member of the public. ACEDC is committed to providing a workplace free from this unlawful conduct.

If the Executive Committee determines that unlawful harassment or discrimination against another employee, board member, or member of the public has occurred, the Committee will take appropriate corrective actions to ensure the offending behavior or circumstances will not recur. Such actions may include, but are not limited to disciplinary actions, including termination, of a party determined to be in violation of this policy.

It is a violation of this policy for an employee, Board member, or agent to engage in harassment. Harassment is a form of discrimination and 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;
- Leering, whistling, suggestive or insulting comments; and/or
- Retaliation of any kind for having filed or supported a complaint of sexual harassment (e.g. ostracizing the person, pressuring the person to drop or not support the complaint, adversely altering that person's duties or work environment, etc.).

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: Reporting Harassment; Discrimination

Any employee, client, customer, or member of the public who believes they have been the target of unlawful harassment or discriminatory treatment by an employee, board member, participant in an ACEDC activity, or ACEDC agent, or who believes they have been subjected to retaliation for having brought or supported a complaint of unlawful harassment or discrimination, 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 other party, or if direct communication has been ineffective, then the person with the complaint is encouraged to report the situation as soon as possible to the ACEDC Executive Director or the Chairperson of the ACEDC Executive Committee.

In the event of a complaint of unlawful harassment or discrimination, the ACEDC Executive Committee 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 or discrimination is substantiated, the Executive Committee will inform the complaining person of the determination and of the corrective actions the Executive Committee will undertake to address the finding.

If the allegation is not substantiated, the person with the complaint and the accused person shall be informed, and the complainant will be advised of the option to contact appropriate state or federal agencies identified in this policy notice. Although a person raising a complaint under this procedure is encouraged to submit their complaint to ACEDC utilizing this procedure, this process is not required in order for an individual to submit a complaint to a government agency such as the following:

Vermont Attorney General's Office
Civil Rights Unit
109 State Street
Montpelier, VT 05609-1001
<https://ago.vermont.gov/cru-complaint-form>
888-745-9195 (Toll Free VT)
802-828-3657
802-828-3665 (TTY)
ago.civilrights@vermont.gov

United States Equal Employment Opportunity Commission
John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203
<https://publicportal.eeoc.gov/Portal/Login.aspx>
800-669-4000
800-669-6820

Procedure: Reasonable Accommodation for Disability.

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.

Approved and Adopted by Board June 20, 2018

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