Anti-Harassment and Non-Discrimination Policy

Background: The Allen Institute is committed to an inclusive culture which encourages, nurtures, and celebrates diverse voices. The Allen Institute fully supports and complies with federal, state, and local laws forbidding harassment, sexual harassment, or discrimination.

Scope: This policy is applicable to all employees and anyone else working at the Allen Institute, including graduate students, postdoctoral fellows, interns, externs, visiting scientists, vendors, contractors, and sub-contractors.

Responsible Department: The Human Resource department is responsible for ensuring that this policy is current and compliant with all applicable laws and regulations.

Policy Statement: Individuals performing work at, or for, Allen Institute expect to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful conduct, including harassment, sexual harassment, or discrimination. Allen Institute will make every reasonable effort to ensure that all individuals are familiar with this policy and provide appropriate protections.

Prohibited Conduct: The following conduct is prohibited at the Allen Institute and, in compliance with all applicable federal, state and local anti-discrimination and harassment laws and regulations, enforces this policy in accordance with the following definitions and guidelines:

Discrimination: Discrimination is different treatment of an individual or group on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, protected veteran and military status, or genetic information. Discrimination may occur through verbal, physical, visual or other behavior.

Harassment: Harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual or group because of their race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, protected veteran and military status, or genetic information, and that has the purpose or effect of creating an intimidating, hostile or offensive work environment, has the purpose or effect of unreasonably interfering with an individual’s work performance, or otherwise adversely affects an individual’s employment opportunities.
**Sexual Harassment:** Sexual harassment is unwelcome sexual advances, requests for sexual favors, or other visual, verbal, or physical conduct of a sexual nature when submission to such conduct is made either explicitly or implicitly as a term or condition of employment, submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual, or such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating a hostile or offensive working environment.

Actions that may constitute conduct that violates this policy include, but are not limited to:

- Unwelcome sexual advances, such as requests for dates or propositions for sexual favors.
- Visual or physical conduct, like leering, staring, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, calendars, or posters in the workplace.
- Verbal conduct, like making or using derogatory comments, epithets, slurs, teasing, and jokes of a sexual nature.
- Graphic verbal or written comments, including emails or other electronic documents, of a sexual nature.
- Sexually degrading words used to describe an individual.
- Suggestive or obscene letters, emails, notes, or invitations.
- Unwelcome physical contact, including pats, hugs, brushes, touches, shoulder rubs, assaults, or impeding or blocking movements.
- Offering or conditioning an employment benefit, like a raise, a promotion, or a special job assignment, in exchange for sexual favors.
- Firing, denying a job, promotion, or special assignment or denial of some other employment benefit because the employee refused to grant sexual favors, complained about harassment or assisted in the investigation of harassment.
- Making or threatening reprisals or changing performance expectations after an employee has turned down a sexual advance.

**Duty to Report.** Managers and supervisors who become aware of situations involving conduct or retaliation of harassment, sexual harassment, or discrimination, have a responsibility to take immediate action, which includes contacting Human Resources.

**No Retaliation.** As defined in our [No Retaliation Policy](#), acts of retaliation for engaging in a legally protected activity, such as reporting a concern of harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination, should be reported immediately and will be promptly investigated and addressed.
**Reporting A Concern.** Individuals are encouraged to report all concerns of harassment, sexual harassment or, discrimination through various reporting channels available below. It is the policy of the Allen Institute to promptly and thoroughly investigate such reports. Allen Institute encourages reporting of all conduct or retaliation of harassment, sexual harassment, or discrimination, regardless of the offender’s identity or position.

Individuals who believe that they have been the victim of such conduct should discuss their concerns with their immediate supervisor, any other supervisor, Human Resources or through our Report-It Helpline ([http://www.reportit.net](http://www.reportit.net) [username: alleninstitute; password: brain]), as further described in our Whistleblower Policy.

All investigations will be conducted internally, although HR may determine that a third party may be contracted to complete the investigation. All complaints involving senior management at the vice-president level or above will be handled by an external third party.

Allen Institute will do its best to maintain confidentiality throughout the investigatory process to the extent consistent with investigation best practices.

**Complaint Procedure.** Allen Institute will follow the general procedure outlined in this section for a complaint of harassment, sexual harassment, or discrimination. HR’s role in managing complaints is to ensure employee safety, advise the individuals involved, and evaluate the complaint to understand how best to promote a work environment that is aligned with our Code of Conduct, Values, Culture, Mission, and DE&I Vision of Success. The Institute will treat all aspects of the complaint procedure confidentially to the extent possible.

1. Report your concern through one of the channels noted above.
2. Human Resources will conduct an appropriate investigation of all complaints of harassment, sexual harassment, discrimination, and retaliation of conduct covered under this policy.
3. Allen Institute employees are expected to cooperate in the investigatory process.
4. Upon conclusion of an investigation, if it is determined that a violation of this policy has occurred, HR will recommend the appropriate corrective action.

Violation of this policy will be dealt with appropriately. Responsive action may include training, referral to counseling or disciplinary action such as a warning, withholding of a promotion or pay increase, reassignment, temporary suspension without pay, or termination, as determined to be appropriate under the circumstances. As with all personnel matters, the corrective action will remain confidential.

**References:**
No Retaliation Policy
Whistleblower Policy

For questions regarding this policy, please contact Human Resources at HR@alleninstitute.org