

A. ANTI-HARASSMENT AND ANTI-DISCRIMINATION POLICY

I. Introduction

Open Stories Foundation recognizes that when harassment takes place it does so inside the broader frame of pay inequity and chronic discrimination based on sex, gender, race, and other protected characteristics. Such harassment and discrimination is unacceptable, ethically intolerable and socially debilitating. It may also be illegal.

Open Stories Foundation is committed to providing a work environment for all employees that is free from harassment and discrimination, where everyone is affirmed as they are, and where they can thrive in doing their work. To do this we expect employees to conduct themselves in a professional manner while representing Open Stories Foundation in any capacity and to show respect for their co-workers and any others with whom they interact on behalf of Open Stories Foundation.

Open Stories Foundation has zero tolerance for harassment and discrimination and expressly prohibits them on the basis of gender, sexual orientation, gender identity, race or ethnicity, age, disability, religion, national origin, immigration status, pregnancy, genetic information, marital status, veteran status, or any other protected status. Open Stories Foundation will not tolerate harassment of any employee by anyone either within the organization or outside Open Stories Foundation. These include people that an employee may interact with in connection with their work responsibilities, including donors, volunteers, interns, independent contractors, business partners, third-party service providers, or members of the public. This policy of zero tolerance also applies to harassment by an Open Stories Foundation employee toward a team member or anyone they may interact with in connection with their work.

Open Stories Foundation understands the need to support persons in the organization in reporting harassment and expressly prohibits retaliation against anyone who reports discrimination or harassment or participates in an investigation of such a report. See Open Stories Foundation's Anti-Retaliation Policy below for additional information.

II. Prohibited Harassment and Discrimination

This policy defines harassment as verbal, written, or physical conduct that denigrates or shows hostility, aversion, or favoritism toward a person or their relatives, friends, or associates because of gender, sexual orientation, gender identity, race or ethnicity, age, disability, religion, national origin, immigration status, pregnancy, genetic information, marital status, veteran status or any other protected status and:

1. has the purpose or effect of creating an intimidating, hostile, or offensive work environment,
2. has the purpose or effect of unreasonably interfering with a person's work performance, or

3. otherwise adversely affects a person's employment opportunities.

Sexual harassment constitutes discrimination and is illegal under federal, state, and local laws. For the purposes of this policy, sexual harassment is defined as it is in the Equal Employment Opportunity Commission (EEOC) Guidelines as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

1. submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment,
2. submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting that individual, or
3. such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment includes a range of subtle and not-so-subtle behaviors and may involve persons of the same or different gender. Depending on the circumstances, these behaviors may include:

- unwanted sexual advances or requests for sexual favors;
- sexual jokes and innuendos;
- verbal abuse of a sexual nature;
- comments about a person's body, sexual prowess, or sexual deficiencies;
- leering, whistling, or touching;
- insulting or obscene comments or gestures;
- display in the workplace of sexually suggestive objects, pictures, or other materials; and
- other physical, verbal, or visual conduct of a sexual nature.

This list is not exhaustive.

While such behavior, depending on the circumstances, may not be severe or pervasive enough to create a hostile work environment, it can nonetheless make co-workers uncomfortable. Accordingly, such behavior is inappropriate and may result in disciplinary action regardless of whether it is unlawful.

Open Stories Foundation considers sexual or romantic advances or innuendos by persons in a supervisory or authoritative role toward subordinates within the same department or chain of command, or by persons having authority over staffing or salary decisions, to be harassment for which disciplinary action will be taken.

III. Complaint and Investigation Process

Open Stories Foundation encourages employees to raise concerns about behavior that makes them uncomfortable. Open Stories Foundation also encourages people who believe they or others are being subjected to harassment to promptly advise the offender that their behavior is unwelcome and request that it stop. This action alone may resolve the problem. Open Stories Foundation recognizes, however, that a

person may not always feel comfortable addressing the behavior directly with the offender and may prefer to pursue the matter through complaint procedures.

Open Stories Foundation encourages prompt and full reporting of all perceived incidents of discrimination or harassment to your supervisor or to the Executive Director. If the allegation of harassment is against the Executive Director, the employee should notify the Chair of Open Stories Foundation's Board of Directors. If the employee is not comfortable making a report to their supervisor, the Executive Director, or the Chair of the Open Stories Foundation Board, an employee may also report any perceived incidents of discrimination or harassment to any current member of the Open Stories Foundation Board of Directors.

This applies if the employee has been harassed or has witnessed or has knowledge of harassment involving Open Stories Foundation employees and/or any other persons acting (or who could reasonably be perceived to be acting) on Open Stories Foundation's behalf, including volunteers, interns, donors, business partners, independent contractors, third-party service providers, or members of the public. It is essential that complaints or concerns be promptly reported so that Open Stories Foundation can investigate and take appropriate action. It also helps Open Stories Foundation assess whether the situation is part of a pattern of behavior. Failure to report promptly may impair Open Stories Foundation's ability to thoroughly investigate and resolve the complaint. Therefore, although no fixed reporting period has been established for perceived harassment or discrimination, early reporting and intervention are strongly encouraged.

Either the Executive Director, the Board Chair, or someone designated by them will promptly and thoroughly investigate all reports of harassment as discreetly and confidentially as practicable. In no event will any individual(s), accused or otherwise involved (i.e. as a witness), in a complaint be allowed to be involved in Open Stories Foundation's investigation of that complaint.

Confidentiality will be maintained throughout the investigation to the extent consistent with adequate investigation and appropriate disciplinary action. The investigation may include individual interviews with the parties involved and, where necessary, with persons who may have observed the alleged conduct or may have other relevant knowledge. At the conclusion of a thorough investigation, both the person who submitted the complaint and any individual accused of harassment or discrimination in the complaint will be notified of the conclusion of the investigation, including any findings of harassment and any disciplinary or other administrative actions that will be taken.

If the person making the complaint, or the alleged perpetrator, does not agree with the resolution of a complaint, that person may meet with the Executive Director (or Board Chair if the Executive Director was accused) to explain why they view the resolution as unsatisfactory and propose an alternative remedy. Any party who disagrees with the resolution of a complaint may appeal to Open Stories Foundation's Board Chair or any member of the Board. If Open Stories Foundation determines that harassment or discrimination has occurred, it will take appropriate disciplinary action against the offending party, up to and including termination of employment.

Retaliation against a person for reporting harassment or for participating in an investigation of a claim of harassment is a serious violation of this policy and will be subject to disciplinary action, up to and including termination of employment. Acts of retaliation should immediately be reported to the Executive Director or to the Board Chair.

Acting in bad faith, such as by submitting false or unjustified complaints against an individual, may itself constitute a form of harassment. Anyone who makes false or malicious complaints of harassment or retaliation shall be subject to disciplinary action up to and including termination of employment.

Employees are encouraged to raise any questions or concerns about this policy with the Executive Director. Open Stories Foundation will continue to evaluate and update this policy over time and welcomes feedback from its employees, volunteers, donors, and supporters.

B. ANTI-RETALIATION POLICY

I. Introduction

Open Stories Foundation strictly prohibits any form of retaliation against an employee who in good faith makes a complaint, raises a concern, provides information, or otherwise assists in an investigation or proceeding regarding any conduct that they reasonably believe to be in violation of Open Stories Foundation's policies or applicable laws, rules, or regulations.

This policy is designed to ensure that all employees feel comfortable speaking out without fear of retaliation when they see, suspect, or have knowledge of illegal or unethical conduct or inappropriate behavior. It is also intended to encourage all employees to cooperate with Open Stories Foundation in the internal investigation of any matter by providing honest, truthful, and complete information without fear of retaliation.

II. Prohibition Against Retaliation

No employee should be discharged, demoted, suspended, threatened, harassed, intimidated, coerced, or retaliated against in any other manner as a result of their making a good faith complaint, or assisting in the handling or investigation of a complaint, that an Open Stories Foundation policy or an applicable law, rule, or regulation has been violated. Employees who in good faith make a complaint or participate in an investigation or proceeding under this policy, however, remain subject to the same standards of performance and conduct as other employees.

Open Stories Foundation prohibits retaliation against employees even if their complaints are proven unfounded by an investigation. An employee who has knowingly made a false allegation, provided false or misleading information in the course of an investigation, or otherwise acted in bad faith will be subject to disciplinary action up to and including termination of employment.

Employees have an obligation to participate in good faith in any internal investigation of retaliation.

III. Reporting Violations

If you believe you have been retaliated against, or that a team member is experiencing, or are aware that any other violation of this policy has occurred, you must immediately notify the Executive Director. If the Executive Director is involved in the retaliation, immediately notify the Board Chair or any other member of the Board of Directors.

Open Stories Foundation takes all reports of retaliation very seriously. The Executive Director or someone designated by the Executive Director will promptly review and investigate all such complaints. In the event that the Executive Director is accused of retaliation, the Board Chair or someone designated by the Board Chair will promptly review and investigate the retaliation complaint.

IV. Disciplinary Action

Any employee who violates this policy is subject to disciplinary action, up to and including termination of employment.

C. RESERVATION OF RIGHTS

These policies do not create any rights in any person who is not an Open Stories Foundation employee. Open Stories Foundation reserves all legal defenses to all claims of unlawful harassment and/or retaliation available to it under local, state, and federal law, including but not limited the defense that it is not subject to these law due to the fact that it does not employ enough employees to fall under their purview.