

## **WRNS Policy Against Discrimination, Harassment and Retaliation**

WRNS Studio is committed to providing a work environment where all individuals are treated with respect and dignity, and that is free from sexual harassment, as well as harassment, discrimination, and retaliation based on race, color, national origin, ancestry, religion and religious creed, political affiliation, citizenship, sex, gender, gender identity (including transgender identity and transitioning), gender expression, sexual orientation, age (40 and over), pregnancy, childbirth or related medical conditions, breastfeeding and related medical conditions, marital status, registered domestic partner status, military or veteran status, legally protected medical condition (including cancer), physical or mental disability, genetic information or characteristics, AIDS/HIV status, status as a victim of domestic violence, sexual assault or stalking, enrollment in a public assistance program, reproductive health decision-making, or any other protected classification under federal, state or local law. Under this Policy, “race” includes traits historically associated with race, including (but not limited to) hair texture, hair type, and protective hairstyles such as (but not limited to) dreadlocks, cornrows, braids, twists, Afros or Bantu knots. Furthermore, “reproductive health decision-making” includes, but is not limited to, a decision to use or access a particular drug, device, product, or medical service for reproductive health.

As such, the Studio maintains a strict policy that forbids sexual and other harassment, discrimination and retaliation of applicants, staff members or interns, by co-workers, supervisors, managers, and owners [partners,] or third parties with whom employees come into contact, consistent with applicable law. Similarly, the Studio will not tolerate harassment by its staff of non-employees with whom the Studio has a business, service or professional relationship. The Studio also will attempt to protect staff members from harassment by non-employees (such as clients, contractors and vendors) in the workplace.

Through enforcement of this policy and by education of employees, WRNS Studio will seek to prevent, correct and discipline behavior that violates this policy. This policy applies at all Studio locations, Studio-sponsored social or other events, and other activities at which you represent the Studio. It applies whether an employee is onsite, teleworking, or conducting business offsite. The Studio’s commitment to equal employment opportunity and a respectful work environment, and the responsibility of all employees to comply with this policy, applies at all times.

It is the responsibility of all staff members and partners to ensure compliance with this policy.

### **Discrimination**

It is a violation of the Studio’s policy to discriminate in the provision of employment opportunities, benefits or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if that discriminatory treatment is, in whole or in part, based on a protected classification under federal, state or local law. Discrimination in violation of this policy will be subject to disciplinary measures up to and including termination.

### **Harassment**

Harassment, whether sexual or based on another protected characteristic, includes verbal, physical and visual conduct that is personally offensive, intimidating, or hostile, or interferes with work performance, regardless of whether it rises to the level of violating the law. In other words, this Policy Against Discrimination, Harassment and Retaliation is stricter than the law, in that this Policy defines

harassment more broadly than does the law.

Below are some examples of harassment that WRNS Studio will not allow or tolerate. While the conduct described below may not constitute unlawful behavior in all circumstances, such conduct is considered unprofessional and unacceptable by the Studio.

Harassment in employment may take many different forms. For example, it might be:

- Something someone says or does (or does not say or do), whether in person or remotely
- An email, letter or document
- A post on the internet (for example, on social media such as Facebook or Twitter, or on a blog)
- A message or text sent by instant messenger, Zoom, Teams or other applications
- A physical gesture

Examples of behavior that could rise to the level of harassment if based on protected characteristics include:

- Derogatory or vulgar comments
- Displays of offensive material or offensive jokes, slurs or epithets, or derogatory posters, cartoons, drawing or gestures
- Public or private humiliation and/or intimidation
- Transmitting, communicating or receiving sexually-suggestive, pornographic, or sexually explicit pictures, messages or material
- Assault, blocking normal movement, restraint, touching or other physical interference with work directed at an individual
- Threats and demands to submit to certain conduct or to perform certain actions in order to keep or get a job, to avoid the loss of job benefits, security or promotion
- Deliberate and blatant disrespect for personal characteristics, such as race, religion, sex, national origin, sexual orientation or gender identity or expression (such as comments about “non-conforming” appearance or attire, or refusing to refer to or use one’s stated pronouns or name)
- Spreading rumors with a deliberate intention to cause harm to an individual, or persistent, unjustified and/or unnecessary negative attacks on a person’s personal or professional life
- Deliberate exclusion from work social activities
- Retaliation by any of the above means for having reported harassment or discrimination or having assisted another individual in reporting harassment or discrimination

The Studio also does not tolerate abusive conduct or bullying toward any person in the workplace. This includes conduct in the workplace, with malice, that a reasonable person would find hostile, offensive, and unrelated to the Studio’s legitimate business interests. Abusive conduct may include repeated infliction of verbal abuse, such as the use of derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person’s work performance.

The Studio understands that victims of harassment are often embarrassed and reluctant to report acts of harassment for fear of being blamed, concerns about retaliation, or because it is difficult to discuss matters of harassment, including sexual harassment, openly with others. However, no employee should have to endure harassing conduct, and the Studio therefore encourages all employees to report (see Discrimination, Harassment & Retaliation Reporting Procedure below) any incidents of harassment

immediately so that complaints can be quickly and fairly resolved. If you find conduct in the workplace to be unwelcome or offensive, you may immediately inform the person engaging in the conduct in a clear and unambiguous manner that the conduct is unwelcome or offensive and that you want the conduct to stop.

### **No Retaliation**

Adherence to this policy and cooperation in the Studio's efforts to enforce the policy is essential. Therefore, WRNS Studio will not tolerate any reprisals or retaliation against anyone who in good faith reports known or suspected prohibited harassment or discrimination or for appropriately initiating, assisting or participating in any discrimination or harassment investigation, action or proceeding.

### **Sexual Harassment Policy:**

WRNS Studio strictly prohibits sexual harassment and is committed to maintaining an environment free from sexual harassment. Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender. Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex when:

- Such conduct is made either explicitly or implicitly a term or condition of employment;
- Submission to or rejection of advances is used as a basis for making employment decisions; or
- Such conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment

Examples of sexual harassment include the following:

- Unwelcome sexual advances, flirtations or propositions
- Requests or subtle pressure for sexual favors, or other verbal or physical conduct of a sexual nature
- Offering employment benefits in exchange for sexual favors
- Derogatory or vulgar comments regarding an individual's sexuality or appearance, repeated offensive flirtations, slurs, jokes or epithets
- Offensive physical contact or conduct that interferes with an staff member's work performance
- Visual conduct including leering, sexual gestures, displaying sexually graphic objects or pictures, cartoons or posters
- Making or threatening reprisals after a negative response to sexual advances
- Sending sexually explicit e-mails or text messages

These examples are not an exhaustive list of the kinds of conduct that should not occur in the workplace. The point is that any unsolicited, unwelcome or offensive conduct that has sexual overtones is simply unacceptable in the workplace. Sexually harassing conduct can occur regardless of the sex, sexual orientation, or gender identity of the harasser or of the person being harassed. Furthermore, sexually harassing conduct need not be motivated by sexual desire to violate this policy or the law.

Sexual harassment is considered a form of employee misconduct. Corrective action, up to and including

termination of employment, will be taken against individuals engaging in sexual harassment and against supervisory and managerial personnel who knowingly allow such behavior to continue.

#### **Discrimination, Harassment & Retaliation Reporting Procedure:**

Any staff member who feels that they are a victim of workplace harassment, discrimination, retaliation or other violations of the Studio's Equal Employment Opportunity Policy, Policy Against Discrimination, Harassment and Retaliation, or Sexual Harassment Policy, or who observes conduct which they reasonably believe constitutes harassment or discrimination, must immediately report such conduct to one of the Owners or the Director of Human Resources. Staff members are encouraged (but not required) to use [WRNS Studio's Complaint Form for Reporting Harassment](#) (attached to this policy as Addendum A) to report incidents of harassment.

Staff members may be asked to set forth the particulars of their complaint in a confidential memorandum. This complaint procedure is specifically designed so that individuals in the workplace have a mechanism that allows them to bypass a supervisor or co-worker the individual believes is engaged in prohibited conduct under this policy. No one, not even the highest-ranking individuals in the Studio, is exempt from the requirements of this policy.

Owners and supervisors who receive complaints or who observe or otherwise learn about harassing conduct or other conduct in violation of this policy must inform the Director of Human Resources or the Managing Owner immediately. The failure to report, or knowingly allowing harassment, discrimination or retaliation to continue, may subject the Owner or supervisor to discipline, up to and including termination.

WRNS Studio takes all complaints of discrimination, harassment and retaliation seriously. Every reported complaint will be investigated in a timely, fair, impartial and thorough manner that provides all parties involved appropriate due process and reaches reasonable conclusions based on the evidence collected. Typically, the investigation will include the following steps: an interview of the employee who lodged the complaint to obtain complete details regarding the alleged discrimination, harassment or retaliation; interviews of anyone who is alleged to have committed the alleged misconduct; and interviews of any employees who may have witnessed, or who may have knowledge of, the alleged misconduct. The Studio will make every effort to preserve the confidentiality of the subject matter of the investigation to the extent possible and will disclose sensitive information only to the extent needed to conduct a thorough inquiry. All staff have an obligation to cooperate with any investigation.

The investigation will be documented and the Studio will advise the complaining party, as well as other individuals as appropriate, of the results of the investigation and whether appropriate corrective action has been taken.

Should the Studio's investigation result in a finding of misconduct, the Studio will take appropriate remedial and/or disciplinary action to stop the misconduct and to prevent further harassment, discrimination or retaliation. Any staff member who is found after investigation to have engaged in harassment, discrimination or retaliation in violation of this policy will be subject to disciplinary action, depending on the circumstances, up to and including termination. The Studio will also take appropriate corrective action if it learns that any third party in the workplace has engaged in improper harassment. Violation of the law may also lead to personal legal and financial liability for the responsible individual.

In addition to the Studio's reporting and investigation procedure, the U.S. Equal Employment

Opportunity Commission (EEOC) investigates and prosecute complaints of harassment, discrimination and retaliation in employment. Staff can contact the EEOC at [www.eeoc.gov](http://www.eeoc.gov) or (800) 669-4000. Staff may also contact their state fair employment agency, listed below, may also contact a local fair employment agency as applicable, and may also have rights to file a lawsuit in court. Upon a finding of unlawful discrimination, harassment or retaliation, an agency or court has the power to award relief, which varies but may include requiring the employer to take action to stop the harassment, or redress the damage caused, including paying monetary damages, attorney's fees and civil fines. In some cases, where the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime and employees may contact the local police department.

Contacts for state fair employment or human rights agencies are as follows:

- California Civil Rights Department (formerly Department of Fair Employment and Housing) at (800) 884-1684 or <https://calcivilrights.ca.gov/>.
- New York State Division of Human Rights at (718) 741-8400 or [www.dhr.ny.gov](http://www.dhr.ny.gov).
- Hawaii Civil Rights Commission at (808) 586-8636 or <http://labor.hawaii.gov/hcrc/>.
- Washington State Human Rights Commission at (800) 233-3247 or <https://www.hum.wa.gov/>.

In addition, many cities also enforce laws protecting individuals from sexual harassment and discrimination. For example, staff members who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 22 Reade Street, 1st Floor, New York, New York; call 311 or (212) 306-7450; or visit [www.nyc.gov/html/cchr/html/home/home.shtml](http://www.nyc.gov/html/cchr/html/home/home.shtml).

No staff member will be retaliated against for reporting in good faith alleged harassment or discrimination, for filing an administrative charge of harassment or discrimination, or for participating in an investigation, proceeding or hearing conducted by the Studio or by any federal, state, or local agency investigating a complaint of harassment or discrimination. Staff members should immediately report any incidents of suspected retaliation to the Director of Human Resources or any Owner, so that the matter can be investigated and appropriate action may be taken.