



Policy Memo

Reference:

***Sexual Harassment
Policy***

Date of Issue: January 8, 2016

Effective Date: January 8, 2016

*Supersedes #: 2015 Sexual
Harassment Policy*

Issued By: Human Resources

*Approved By: Don Scherzer,
CEO*

SPICER SEXUAL HARASSMENT POLICY

Intent:

To protect all employees from harassment issues in the workplace.

Who will this affect?

All Spicer Group employees will be held to and protected by this policy.

Purpose:

Spicer Group fully supports and complies with laws to protect and safeguard the rights and opportunities of all people to seek, obtain, and hold employment without exposure to sexual harassment or discrimination of any kind in the work place. It is the policy of this firm to provide an environment free of sexual harassment.

Policy:

Sexual harassment is a violation of State and Federal laws, and it is against the policies of Spicer Group, Inc. for any employee, male or female, to sexually harass another employee by:

- Making unwelcome sexual advances or requests for sexual favors or other verbal or physical conduct of a sexual nature, a condition of an employee's employment; or
- Making submission to or rejections of such conduct the basis for employment decisions affecting the employee; or
- Creating an intimidating, hostile, or offensive working environment by such conduct.

Sexual harassment does not refer to behavior or occasional compliments of a socially acceptable nature. It refers to behavior that is not welcome, that is personally offensive, that fails to respect the rights of others, that lowers morale and that, therefore, interferes with our work effectiveness. Sexual harassment may take different forms. One specific form is the demand of sexual favors. Others include:

- Verbal sexual innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, threats.
- Non-verbal sexually suggestive objects or pictures, graphic commentaries, suggestive or insulting sounds, leering, whistling, obscene gestures.
- Unwanted physical contact, including; touching, pinching, brushing the body, coerced sexual intercourse, and assault.

Sexual harassment may be overt or subtle. However, whatever form it takes—verbal, non-verbal or physical—sexual harassment can be insulting and demeaning to the recipient and cannot be tolerated in the work place. Sexual harassment by any employee, manager, or supervisor will not be tolerated. Additionally, non-employees such as suppliers and customers, will be required to comply with this policy.

All employees, managers, supervisors, and non-employees alike, will be expected to comply with this policy and take appropriate measures to ensure that such conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy against sexual harassment. **BASED ON THE SERIOUSNESS OF THE OFFENSE, DISCIPLINARY ACTION MAY INCLUDE REPRIMAND, SUSPENSION, OR TERMINATION.**

Sexual Harassment/Equal Employment Opportunity Complaint Procedure

1. Any employee who believes he or she has been the subject of sexual harassment should report the alleged act immediately to Human Resources, where a complaint form will be provided to the employee. A copy of this form may be found at the end of this Section (3-12) and in Appendix C. Although it is not necessary, all complaining employees are encouraged to complete and return the complaint form to the Human Resource Manager.
2. If a complaint involves the supervisor, the complaint should be filed directly with the President/CEO or the Human Resource Manager.
3. All complaints will be handled in a timely and confidential manner. The purpose of this provision is to protect the confidentiality of the employee who files a complaint, to encourage the reporting of any incidents of sexual harassment, and to protect the reputation of any employee wrongfully charged with sexual harassment.
4. Investigation of a complaint will normally include conferring with the parties involved and any named or apparent witnesses. Employees will be guaranteed an impartial and fair review and investigation. All employees will be protected from coercion, intimidation, retaliation, interference or discrimination for filing a complaint or assisting in an investigation.
5. If the investigation reveals that the complaint is valid, prompt attention and disciplinary action designed to stop the harassment immediately and to prevent its recurrence will be taken.

Outside Avenues of Appeal

Several outside civil rights avenues of appeal exist. They include:

Michigan Department of Civil Rights - Complaint Investigation

Saginaw - (989) 758-1686 (411 E. Genesee, Saginaw, MI 48601)

St. Johns - (517) 334-9335 (741 N. Cedar, Suite 101, Lansing, MI)

Caro - (989) 758-1686 (411 E. Genesee, Saginaw, MI)

Detroit - (313) 456-3700 (3054 W. Grand Blvd., Suite 3-600, Detroit, MI 48202)

Office of Federal Contract Compliance Programs (OFCCP)

Grand Rapids Office (616) 456-2166

Washington, D.C. Office (202) 523-9368

U.S. Equal Employment Opportunity Commission

Detroit Office (313) 456-3700

Washington, D.C. Office (800) 669-4000

Spicer Group recognizes that the question of whether a particular action or incident is a purely personal, social relationship without a discriminatory employment effect requires a factual determination based on all facts in the matter. Given the nature of this type of discrimination, the employer recognizes also that

false accusations of sexual harassment can have serious effects on innocent individuals. We trust that all employees of Spicer Group will continue to act responsibly to establish and maintain a pleasant working environment, free of sexual harassment. Spicer Group encourages any employee to raise questions he or she may have regarding sexual harassment with Human Resources.