

(1) **Anti-Discrimination Policy.**

ICCT is an equal opportunity organization and complies with applicable federal, state and local laws governing non-discrimination. ICCT does not discriminate on the basis of race, color, religion, creed, sex, pregnancy, gender, sexual orientation, gender identity or expression, national origin, age, disability, genetic information, marital status, amnesty, status as a covered veteran or any other protected status in accordance with applicable federal, state or local laws. ICCT expressly prohibits any form of unlawful harassment based on race, color, religion, creed, sex, pregnancy, gender, sexual orientation, gender identity or expression, national origin, age, disability, genetic information, marital status, amnesty, status as a covered veteran or any other protected status in accordance with applicable federal, state or local laws.

All volunteers and staff are responsible for ensuring that ICCT's anti-discrimination policy is implemented. Failure to comply with this policy may result in removal from participation with ICCT.

If you have questions about this Policy, contact a member of the Executive Committee.

(2) **Harassment-Free Policy.**

At ICCT, we believe it's essential to provide all volunteers and staff with a respectful and safe environment. As a result, we don't tolerate harassment or any mistreatment of volunteers or staff in the theatre or at ICCT-sponsored events, including unlawful harassment on the basis of the following protected categories: race, color, religion, creed, sex, pregnancy, gender, sexual orientation, gender identity or expression, national origin, age, disability, genetic information, marital status, amnesty, status as a covered veteran or any other protected status in accordance with applicable federal, state or local laws.

Harassment under this Harassment-Free Policy may include conduct that creates a disrespectful, intimidating, hostile, degrading, humiliating, or offensive environment. Engaging in such conduct is a violation of this Policy.

If ICCT determines that conduct has violated this Policy, we will take steps to ensure the conduct is effectively addressed, and any volunteer or staff found to have engaged in harassing conduct may be removed from participation and/or employment with ICCT.

Because the intent of this Policy is to deter conduct that is unwanted, unreasonable, and demeaning, ICCT may consider someone's conduct to be in violation of this Policy even if it falls short of unlawful harassment under applicable law. When determining whether conduct violates this Policy, we consider whether a reasonable person could conclude that the conduct created an intimidating, hostile, degrading, or demeaning environment.

This Policy applies to everyone who volunteers at or works for ICCT. Everyone is responsible for following and upholding this Policy. We don't tolerate harassment of volunteers by non-volunteers (*e.g.*, patrons or vendors), nor do we tolerate harassment of non-volunteers by our volunteers. We

don't tolerate harassment of employees by non-employees, nor do we tolerate harassment of non-employees by employees.

### *Examples of Harassment*

Harassment can range from extreme forms such as violence, threats, or physical touching to less obvious actions like ridiculing, teasing, or repeatedly bothering colleagues or subordinates or refusing to talk to them. Harassment can be verbal or non-verbal.

For example, harassment may include the following types of conduct:

- derogatory or insensitive jokes, pranks, or comments;
- slurs or epithets;
- unwelcome sexual advances or invitations;
- non-verbal behavior such as staring, leering, or gestures;
- ridiculing or demeaning comments;
- innuendos or veiled threats;
- intentionally excluding someone from normal conversations and making them feel unwelcome;
- displaying or sharing offensive images such as posters, videos, photos, cartoons, screensavers, emails, or drawings that are derogatory or sexual;
- offensive comments about appearance, or other personal or physical characteristics, such as sexually charged comments or comments on someone's physical disability;
- unnecessary or unwanted bodily contact such as groping or massaging, blocking normal movement, or physically interfering with the work of another individual; or
- threats or demands that a person submit to sexual requests as a condition of continued participation or to avoid loss of participation, and offers of theater-related benefits in return for sexual favors.

This list of examples is not exhaustive, and there may be other behaviors that constitute unacceptable harassment under the Policy.

“I was joking” or “I didn't mean it that way” are not defenses to allegations of harassment, nor is being under the influence of alcohol or other substances.

If you have questions about this Policy, contact a member of the Executive Committee.

*Sexual Harassment:* Sexual harassment, is harassment specifically based on sex and can happen regardless of the individuals' gender, gender identity, or gender expression and can, for example, occur between same-sex individuals as well as between opposite-sex individuals, and does not require that the harassing conduct be motivated by sexual desire.

Sexual harassment, which is harassment specifically based on sex, can take two forms:

Hostile Environment: Is an environment in which there is: (1) unwelcome sexual advances, unwelcome requests for sexual favors or other unwelcome verbal or physical conduct of a sexual nature occurs and (2) such conduct has the purpose or effect of unreasonably interfering with an individual's performance or creating an intimidating, hostile, or offensive environment at the theater and/or theater-sponsored environment (e.g. ICCT workshop).

Quid Pro Quo Harassment: Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when submission to such conduct is made either explicitly or implicitly a term or condition of an employee's employment, and when submission to or rejection of such conduct by an employee is used as the basis for employment decisions affecting that employee. In the case of a volunteer, quid pro quo can occur when submission to or rejection of such conduct is used as a basis for decisions impacting that volunteer's work in the theater (e.g. role assignments).

### **(3) Complaint Procedure for Harassment or Discrimination**

#### ***Complaint Procedure***

If you suspect harassment, discrimination, or retaliation (see our Policy Prohibiting Retaliation below) has occurred, you are encouraged (and anyone in a supervisory role, like a Show Liaison, is required, ideally within 48 hours) to promptly provide a written or oral complaint to any of the following:

- Show Liaison
- Member of the Executive Committee

Show Liaisons who receive a complaint of, or learn of, information that suggests this Policy may have been violated are required to promptly (ideally within 48 hours) provide that complaint to a Member of the Executive Committee. A Show Liaison that fails to timely report may be removed from his or her duties.

You should report if you believe you have been harassed, discriminated against or retaliated against, or have witnessed or heard about a potential violation. Please report so that ICCT can take steps to remedy any potential violation.

When possible, a complaint should include details of the incident or incidents, names of individuals involved, and names of any witnesses.

As soon as reasonably possible, ICCT will investigate any allegations and take appropriate remedial action.

We will keep all complaints confidential to the extent possible while still fulfilling our obligation to investigate and end any violative conduct.

### ***Investigation Process***

ICCT will promptly investigate and respond to all complaints regarding potential violations of this Policy. If required and upon learning of conduct requiring further review, qualified investigators will complete thorough investigations in a timely and impartial manner.

After notification of the complaint, a confidential investigation by an appropriate Board Member or Members or an outside investigator will immediately be initiated to gather all facts about the complaint.

After the investigation has been completed, a determination will be made by the Board regarding the resolution. If a Board Member or Members are involved, proper recusals will take place.

Nothing in this Policy is to be construed as a guarantee of absolute confidentiality. Disclosure of information learned through the complaint process and the investigation will be limited to disclosures that are necessary for ICCT to investigate and take prompt action to end harassment.

#### **(4) Policy Prohibiting Retaliation**

ICCT recognizes that individuals may find it difficult to raise complaints about discrimination or harassment, so we have a policy meant to encourage individuals to come forward with their concerns without fear of retaliation. It is against our policy to retaliate against another for his or her participation in the complaint process.

Retaliation is when someone penalizes another person for any of the following:

- Reporting what he/she believes in good faith to be harassment or discrimination;
- Expressing an intent to report what he/she believes in good faith to be harassment or discrimination;
- Assisting another in an effort to report harassment or discrimination; or
- Participating in any investigation under this Policy.

A volunteer or employee that retaliates against another ICCT volunteer or employee may be removed from participation with ICCT or from their employment with ICCT.

If you have questions about this Policy, please contact a member of the Executive Committee.

#### **(5) Policy Against Violence**

ICCT will not tolerate violence in any form which stands to jeopardize the safety or well-being of our staff, volunteers, visiting guests or ICCT property. Any person who makes threats, exhibits threatening behavior, engages in or attempts to engage in violent acts on ICCT property and/or at ICCT-sponsored events is subject to immediate removal from the premises and may be subject to

removal from future participation and/or legal action. You should report any threats or threatening behavior to your Show Liaison or Member of the Executive Committee.

ICCT does not allow weapons on its premise, with the exception of approved props, which have individual, specific procedures for safe handling and storage.

### **(6) Two Adult Rule**

At no time shall a minor (a person under the age of 18) be alone in the presence of only one adult during an ICCT-operated program or special event. Private, one-on-one contact between a staff member or volunteer and a minor is prohibited at all times. The two adult rule does not apply if the adult is the minor's parent or guardian.

A volunteer or employee that violates this rule may be removed from participation with ICCT or from their employment with ICCT.