



Anti-Harassment and Discrimination Policy and Complaint Procedures

It is the policy of BBYO to maintain a working environment that encourages mutual respect and promotes respectful and congenial relationships between staff, advisors, teens, and participants, and that is free from all forms of harassment by anyone, including staff, advisors, teens, participants, supervisors, co-workers, vendors, contractors or customers. Discrimination and harassment, even when not unlawful or directed at a protected category, is expressly prohibited and will not be tolerated by BBYO. Accordingly, BBYO management is committed to vigorously addressing complaints of harassment, sexual harassment and discrimination at all levels within the organization.

While all forms of discrimination and harassment are prohibited, it is important to understand the types of conduct that may be viewed as discrimination and harassment and which are not to be engaged in. BBYO will not tolerate discrimination or harassment of any staff, advisor, teen or participant for any reason. The term "harassment" includes harassment based on any category protected by federal, state or local law, which may include depending on the jurisdiction, but is not limited to, unwelcome slurs, jokes, or verbal, graphic or physical conduct relating to an individual's race, color, religious creed, sex, national origin, ancestry, citizenship status, pregnancy, childbirth, physical disability, mental disability, age, military status or status as a Vietnam-era or special disabled veteran, marital status, registered domestic partner or civil union status, gender (including sex stereotyping and gender identity or expression), medical condition (including, but not limited to, cancer related or HIV/AIDS related), genetic information, sexual orientation, or any other protected characteristic under federal, state or local law.

Sexual Harassment

Sexual harassment is a form of sexual discrimination and is not tolerated. Sexual harassment includes, but is not limited to, unwelcome or unwanted sexual advances, requests for sexual acts or favors, lewd or sexually-suggestive remarks, comments or jokes, display or circulation of pictures or written materials of a sexual nature, inappropriate physical contact or other verbal, written or physical conduct of a sexual nature when (i) submission to or rejection of this conduct by an individual is used explicitly or implicitly as a factor in decisions affecting hiring, evaluation, promotion, retention or other aspects of employment; or (ii) this conduct substantially interferes with an individual's employment or creates an intimidating, hostile or offensive work environment. Dating or sexual relationships between employees/adult volunteers and teens is absolutely prohibited.

Without limiting the foregoing, staff, advisors, teens or participants must not use BBYO's, their own, or someone else's computer (including instant messaging and other apps), telephone (including texting), voicemail, email, fax or other communications or information systems to engage in harassment or other conduct prohibited by this policy.

Complaint Procedure

BBYO encourages individuals who believe that they are being subjected to discrimination or harassment to notify the offender that his or her behavior is unwelcome. If for any reason an individual does not want to confront the offender directly, or if this approach does not successfully end the discrimination or harassment, the individual must promptly report the contact. BBYO cannot act if it is not made aware of a situation.

Staff, advisors, teens or participants are required to report known, suspected or potential violations of this policy to their regional staff member, supervisor, the Talent and People Operations Team, or the CEO; alternatively, violations can be reported anonymously and confidentially by telephone. This 24-hour anonymous hotline service is available at 1-833-480-0010 or through the website at www.lighthouse-services.com/bbyo

BBYO is committed to protecting those who, in good faith, report issues concern and suspected violations of this policy. In no event will BBYO staff, advisors, teens or participants take any retaliatory action against someone for making a complaint, exercising their rights under the EEOC or applicable laws, or disclosing or reporting information in good faith. All reports of alleged harassment, sexual harassment or discrimination will be treated seriously. It will be kept confidential, and it will be shared only with those who have a need to know about it. Depending on the circumstances, that could include the alleged harasser. However, absolute confidentiality is not promised, nor can it be assured.

Investigative Procedure

Once a complaint of alleged harassment or sexual harassment or discrimination is received, the organization will begin a prompt and thorough investigation. The investigation may include interviews with all involved parties including the alleged harasser, and any parties who are aware of facts or incidents alleged to have occurred.

Following an investigation, the organization will promptly take any necessary and appropriate disciplinary action. Disciplinary action will be taken if the investigation reveals that staff, advisors, teens or participants have acted in a manner that is not in alignment with the goal of this policy, even when the actions may be lawful. In fact, the organization may address any workplace issue discovered during an investigation. This may include some or all the following steps:

1. Restore any lost terms, conditions or benefits of employment to the complaining employee.
2. Discipline the alleged harasser. This discipline can include written disciplinary warnings, transfer, demotion, suspension, and/or termination of employment or suspension or expulsion from the program.

If the alleged harassment or sexual harassment is from a vendor, contractor, customer or other third party, BBYO will take appropriate action to stop prohibited conduct.

If you have made a complaint but feel that the action taken in response has not remedied the situation, you should make a complaint following the complaint procedure outlined in this policy.

Duties of Employees and Supervisors

All employees of BBYO, both management and non-management, are responsible for assuring that a workplace free of harassment or sexual harassment and discrimination is maintained. Any employee may file a complaint regarding incidents experienced personally or incidents observed in the workplace. BBYO strives to maintain a lawful, pleasant work environment where all employees can effectively perform their work without interference of any type and requests the assistance of all employees in this effort.

All BBYO supervisors and managers are expected to adhere to BBYO's Anti-Harassment and Discrimination Policy.

Additionally, all managers and supervisors are responsible for doing all they can to prevent and discourage harassment, sexual harassment and discrimination from occurring. Supervisors' evaluations may include an assessment of a supervisor's efforts in following and enforcing this policy. If a complaint of harassment or sexual harassment or discrimination is raised, the individual to whom the complaint is made (i.e., supervisor, manager, CEO of BBYO) must act promptly to notify the Talent and People Operations Team so that they may proceed with an investigation. Failure to follow this policy will result in discipline, up to and including immediate termination of employment.

No Retaliation

BBYO expressly prohibits retaliation against any individual who in good faith reports discrimination or harassment or assists in investigating any investigation into such charges. Any form of retaliation is considered a direct violation of this policy and, like discrimination or harassment itself, will be subject to disciplinary action, up to and including termination of employment or expulsion from the program. Any staff, advisor, teen or participant who believes they have been retaliated against must make a report as outlined in the Complaint Procedure section of this policy.