

Policy Number: HR-M04**Policy Title: HR-M04 Policy - Harassment and Bullying****Chapter Location: Human Resources**

Owner: Director, Human Resources Strategic Services	Date Created: 04/1989
Approver(s): Vice President, People Strategy	Date Last Approved: 08/2025
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Policy Statement:

Gillette Children's is committed to providing a safe and inclusive environment free of harassment and bullying, where all team members are valued and respected.

Purpose:

It is the goal of Gillette Children's to promote a workplace that is free of harassment and bullying. The purpose of this policy is to define these behaviors and provide guidance on taking action related to harassment or bullying.

Scope: All Gillette employees (staff, supervisors, physicians, managers, directors and administrators) and non-employees (patients, visitors, the public, volunteers, students, agency staff, vendors and contractors). Also applies to physicians and professional staff who are not directly employed by Gillette.

Oversight: NONE

Definitions:

- **Harassment** is unwelcome conduct toward an individual because of their age, disability, marital status, national origin, race or color, creed, religion, sex, sexual orientation or gender identity, status with regard to public assistance, military status, familial status, genetic information or any other class protected by Federal, state, or local laws, when the conduct creates an intimidating, hostile, or offensive work environment that causes work performance to suffer, or negatively affects job opportunities or compensation. Harassment is illegal, unacceptable, and will not be tolerated at Gillette.
- Harassment includes but is not limited to the following:
 - Verbal or written communication such as derogatory comments, name-calling, slurs, accusations, negative stereotyping, or threats. This includes:
 - Jokes or comments that are crude, distasteful or targeted at individuals or groups based on any characteristic or class protected by Federal, state or local laws, such as jokes that refer to race, ethnicity, religion, sexual orientation, gender identity, physical ability, mental ability, class, or other statuses.

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- Belittling or berating statements or insults that communicate hostile, derogatory, or negative slights or insults to the target person or group, also known as microaggressions.
 - Physical or nonverbal conduct, such as staring, leering, giving inappropriate gifts, assault, impeding or blocking movement, or any physical interference with normal work or movement with is directed at an individual.
 - Visual images such as graphic materials, derogatory posters, cartoons or drawings, inappropriate e-mail messages, offensive pictures, or accessing inappropriate websites.
 - Persistent inappropriate behavior and, or repeated threats.
 - Sexual conduct such as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature such as name calling, gestures, suggestive comments, or lewd talk and jokes. Sexual harassment also occurs when submission to the conduct is made either explicitly or implicitly a term or condition of an individual's employment or submission or rejection of the conduct is used as a basis for employment decisions affecting the individual.
- **Bullying:** abusive conduct which includes repetitive acts or omissions with the intention to harm, and that a reasonable person would find hostile based on the severity, nature, and frequency of the conduct. Bullying can take various forms, including;
 - Physical aggression or violence, such as hitting, pushing, tripping, or damaging someone's property.
 - Hurtful words, name-calling, insults, or threatening language to humiliate or demean the target.
 - Attempts to harm someone's social standing or relationships by spreading rumors, excluding them from social groups, or engaging in public humiliation.
 - Using digital means, such as social media, text messages, emails, or online platforms to harass, embarrass, or threaten the target.
 - Sabotage or undermining of an employee's work performance,
 - Attempts to exploit an employee's known psychological or physical vulnerability,

Procedure:**A) For any type of harassment or bullying**

- 1) If you are aware of any behavior that might violate this policy, make your concerns known through the following steps:
 - a) Clearly inform the person(s) engaging in the harassing or bullying conduct or communications that the behavior is offensive, unwelcome, against Gillette policy and to stop the behavior.
 - b) If you do not wish to communicate directly with the person(s), or if such attempts have been unsuccessful, contact your leader and/or Human Resources to initiate the complaint process.

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- c) If the individual engaging in the harassing or bullying behavior is your supervisor, manager, or director, or if the individual is a senior leader, you should immediately contact a Human Resources representative. If circumstances warrant, after regular business hours call the Administrator on-call listed on amion.com (password: gillette).
 - d) You may be asked to put the facts in writing, including the date, time and nature of the incident(s) and the names of any witnesses. Human Resources will assist with the documentation and processing of a harassment complaint.
 - e) Human Resources will advise you of the investigation process.
- 2) Allegations of harassment and bullying will be investigated promptly and thoroughly. Complaints will be handled in a respectful manner. Information regarding the investigation shall be made available only to those individuals with a legitimate need to know.

B) Protection Against Retaliation

- 1) Gillette will not retaliate against any individual who files a complaint in good faith. Retaliation is a violation of this policy and must be reported immediately. Any individual found to have retaliated against an employee who files a complaint or anyone participating in an investigation will be subject to appropriate disciplinary action up to and including immediate termination.

C) Discipline

- 1) A violation of this policy is grounds for immediate discipline, up to and including termination. Gillette recognizes that false accusations can have serious effects on innocent individuals. Accordingly, accusations that are knowingly false are also grounds for discipline up to and including termination.
- 2) When unprofessional or disrespectful behavior, even if not illegal, interferes with a professional, productive or safe work environment, it will not be tolerated. Gillette reserves the right to respond to inappropriate behavior even where no one has complained or indicated they have been offended.

D) Responsibility

- 1) It is the responsibility of all employees and team members to conduct themselves in a manner consistent with this policy. All leaders will strive to maintain a work environment free of harassment and bullying.
- 2) Although the organization may not be absolutely liable for harassment by non-supervisory employees, it could be held liable if it were determined that a leader knew or should have known such conduct occurred and failed to take proper action. This places primary responsibility on supervisors, managers, and directors to prevent sexually explicit language, obscene gestures, and other inappropriate conduct that they have reason to believe may be offensive to any team member. Leaders must deal expeditiously and fairly with allegations of harassment within their departments whether or not there has been a written or formal complaint. Leaders must act promptly to investigate harassment, bullying, or inappropriate sexually oriented conduct, and ensure

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that harassment, bullying, or inappropriate sexually oriented conduct is reported to Human Resources, and take immediate corrective action to prevent prohibited conduct from reoccurring.

- 3) Effective leadership requires that directors, managers, and supervisors talk with their employees about their job performance. Constructive criticism and supervisory actions regarding performance deficiencies or other workplace issues are not harassment, bullying or retaliation.

E) Consensual Relationships

- 1) Although having a consensual romantic relationship with another Gillette team member is not harassment, harassment may occur as a result of the relationship if either person in the relationship engages in conduct in the workplace that is inappropriate or unwelcome. Sexual or romantic relationships involving supervisors and subordinates are not allowed because of the real or perceived problems inherent in mixing personal and professional relationships. Employees who engage in a supervisor subordinate relationship must report the relationship to their leader and Human Resources for options. Gillette retains its right to terminate, transfer, demote individuals or take whatever employment action it deems appropriate under the circumstances.

F) The Harassment and Bullying policy will be distributed to all new employees.**Related Documents:**

HR-E04 Constructive Discipline Performance Improvement

A44 – Professional Conduct

SC09 – Workplace Violence

References: Title VII of the Civil Rights Act of 1964

Age Discrimination in Employment Act of 1967

Americans with Disabilities Act of 1990

The Occupational Safety and Health Act

THIS POLICY SUPERSEDES ANY PREVIOUS GILLETTE POLICIES OR PRACTICES