

Anti-harassment Policy

The SOA is committed to assuring equal employment opportunity and does not tolerate any form of discrimination, sexual harassment or other harassment based on an individual's race, color, national origin, ancestry, religion, pregnancy status, age, gender, sexual orientation, gender identity, marital status, physical or mental disability, military or veteran status, genetic information, order of protection status, or any other status protected by applicable federal, state or local law (which traits and statuses are referenced collectively in this policy as "protected characteristics"). This policy applies whether the harassment or discrimination is committed by an employee, temporary worker, candidate, volunteer, board member, other SOA member, visitor, vendor and any other person with whom the SOA conducts business.

Complaints will be investigated and, in cases where the allegation has been confirmed or corrective action found to be necessary, appropriate corrective action (including, in appropriate cases, disciplinary action) will be taken. The Society of Actuaries' primary concern is the provision of an optimal work environment for all employees.

I. Definitions

Discrimination consists of actions taken against an individual based on a characteristic protected by law, such as sex, race, color, ancestry, national origin, citizenship status, religion, age, disability, marital status, sexual orientation, gender identity, pregnancy, military or veteran status, genetic information, order of protection status, or any other category protected by applicable law. In other words, discrimination occurs when an individual is treated differently or unequally because the individual is a member of a protected group.

Harassment means any unwelcome verbal, physical, or visual conduct, of any type, that tends to belittle, demean, degrade, intimidate, offend or provoke another person based on that person's protected characteristics. Such harassment, whether unlawful or simply inappropriate, will not be tolerated by the SOA. It includes jokes, gestures, remarks, comments, statements and any other conduct, whether verbal, physical or otherwise, that affects tangible job benefits, interferes unreasonably with an individual's work performance, or creates an intimidating, hostile or offensive working environment. The conduct forbidden by this policy specifically includes, but is not limited to: (a) epithets, slurs, negative stereotypes or intimidating acts that are based on a person's protected status; and (b) written or graphic material circulated within or posted within the workplace that shows hostility toward a person because of his or her protected characteristics.

Sexual harassment in particular includes any unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when made to an employee where:

1. Submission to such conduct is made an explicit or implicit a term or condition of an individual's employment, *or*

2. Submission to or rejection of such conduct is used as the basis for an employment decision (either positive or negative), *or*

3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Examples of sexually harassing conduct might include, without limitation:

- Unwanted physical contact, conduct or gestures of any kind, including flirtations, touching, advances or propositions.
- Requests for sexual acts or favor or, initiation of an unwanted sexual relationship.
- Verbal harassment of a sexual nature such as lewd comments, sexual jokes or references and offensive personal references.
- Demeaning, insulting, intimidating or sexually suggestive comments about an individual's personal appearance or personal attributes or anatomy (whether positive or negative).
- The display of demeaning, insulting, intimidating or sexually suggestive objects, pictures or photographs.
- Demeaning, insulting, intimidating or sexually suggestive comments, remarks, written, recorded or electronic messages or other communications, whether written or oral.
- Prolonged and inappropriate staring, ogling or whistling.
- Unwelcome touching of any kind, including pinching, patting, fondling, grabbing, brushing against or poking.
- Comments or statements about an individual's sexual exploits, sexual prowess, sexual desires, sexual experience, or other such topics.

Please note that an individual need not be propositioned, touched offensively, or directly subject to any type of harassment (whether sexual or otherwise) to be harassed in violation of this policy. This policy prohibits harassment that is indirect or circumstantial, as well as harassment that is direct. This policy also prohibits harassment between and among all types of employees and supervisors, of all levels and of both genders.

This behavior is unacceptable in the workplace itself and in other work-related settings such as offsite business meetings and business-related social events.

II. Application

This policy applies to all employees of the SOA, of all levels, including employees and managers, as well as to all individuals with whom an SOA employee comes into contact because of his/her employment. This policy also applies to harassment that occurs in the workplace within the SOA's office as well as offsite, wherever an individual's work of the SOA takes them.

III. Reporting Complaints

1. All SOA employees are responsible to help ensure that harassment and discrimination do not occur and are not tolerated. An employee who believes they are being harassed or discriminated against should, if comfortable, ask the individual to stop the offensive behavior; *this step is **not** required, however. If the employee is at all uncomfortable about addressing the matter directly with the offending individual, the employee can still bring forth a complaint even if he/she has not told the alleged harasser to stop the behavior.*

2. Any employee who believes he or she is a victim of harassment or who witnesses harassing behavior should **promptly report** such conduct to any one of the following individuals:

- Any Supervisor
- The Director of Human Resources or Human Resources Generalist
- The Deputy Executive Director or the Executive Director
- The General Counsel or Assistant General Counsel

The report can be made in person, by phone, or via email.

3. Supervisors or managers who receive a complaint of harassment must report such complaints immediately pursuant to this policy.

IV. Investigating Complaints

1. The Director of Human Resources or another duly-authorized individual will investigate all harassment complaints and make all reasonable efforts to resolve the matter informally. These efforts may include, but are not limited to, convening conferences with the complainant and/or the accused harasser/discriminator to discuss the complaint and the results of the investigation.

2. If the complainant or the accused is not satisfied with the disposition of the investigation, he or she may submit in writing an appeal to the Executive Director or his/her designee, who will review the investigation report and make a final decision. At the Executive Director's option, he/she or his/her designee may conduct further investigation, if necessary.

3. Confidentiality will be maintained as much as possible consistent with the SOA's legal obligations, and only those with a need to know will be informed of the complaint's existence and of the findings of the investigation. *Please note, however, that some disclosure of the complaint may well be necessary to conduct an appropriate investigation and remedial action (as necessary), and the SOA reserves the right to make such disclosure as required.*

4. Employees who may have knowledge of facts relating to the complaint are required to cooperate fully with the investigation. Failure to do so may result in disciplinary action, up to and including termination of employment.

V. Corrective Action

1. Any employee, regardless of position or title, found to have violated this policy (including the prohibition against retaliation articulated below) will be disciplined as appropriate, up to and including immediate termination. The SOA may also take other corrective and/or remedial action in response to a complaint and/or finding of harassment, in its sole discretion, depending on the circumstances of the complaint, statements or actions at issue.

2. Each supervisor and manager has a responsibility to keep the workplace free of any form of harassment in violation of this policy. Supervisors who are found to have threatened or insinuated, either explicitly or implicitly, that any employee's refusal to submit to harassment will affect the employee's terms or conditions of employment, or who otherwise discourage or dissuade an employee from reporting harassment pursuant to this policy, will be subject to disciplinary action, up to and including termination.

VI. No Retaliation

1. The SOA prohibits any form of retaliation against employees who, in good faith, report alleged harassment or cooperate in the investigation of a complaint. However, any individual who brings forth or submits a complaint of harassment known to be false or to be based on false information may be subject to disciplinary action, which could include termination under the appropriate circumstances.

2. Employees and managers found to have engaged in any type of retaliatory behavior will be subject to disciplinary action, up to and including termination.