

**MARC COMMUNITY RESOURCES, LTD.**  
**Equal Employment Opportunity and Anti-Harassment Policy**

**Purpose:**

MARC Community Resources, Ltd. (MARC) strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment at MARC should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. MARC will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, MARC will seek to prevent, correct and discipline behavior that violates this policy.

**Scope:**

This policy applies to all MARC employees, participants, volunteers, contractors, and visitors.

**Policy:**

**Equal Opportunity Employment**

MARC Community Resources, Ltd. (MARC) is committed to the principles of equal employment. We are committed to complying with all federal, state, and local laws providing equal employment opportunities and all other employment laws and regulations. It is our intent to maintain a work environment that is free of harassment, discrimination, or retaliation because of race, color, religious creed, age, marital status, familial status, national origin, ancestry, sex, gender identity or expression, intellectual disability, mental disability, learning disability, lawful source of income, or physical disability, including but not limited to blindness or deafness in all aspects of the employment process and relationship. MARC is dedicated to the fulfillment of this policy regarding all aspects of employment, including but not limited to recruiting, hiring, placement, transfer, training, promotion, rates of pay, and other compensation, termination, and all other terms, conditions and privileges of employment.

MARC will conduct a prompt and thorough investigation of all allegations of discrimination, harassment, or retaliation, or any violation of this Policy in a confidential manner. MARC will take appropriate corrective action, if and where warranted. MARC prohibits retaliation against anyone who provides information about, complains about, or assists in investigating any complaint of discrimination or violation of the Equal Employment Opportunity Policy.

**ADA Compliance**

The federal American's with Disabilities Act (ADA) prohibits discrimination against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, fringe benefits, job training, and other terms, conditions, and privileges of employment. The ADA does not alter the Company's right to hire the best-qualified applicant, but it does prohibit discrimination against a qualified applicant or employee because of his or her disability or because of a perceived disability. MARC prohibits discrimination of any kind against people with disabilities. If you believe that an employment decision has been made that does not conform to the ADA, you should promptly bring the matter to Human Resources' attention.

**Reasonable Accommodation**

MARC complies with the Americans with Disabilities Act (ADA), the Pregnancy Discrimination Act, and all applicable state and local fair employment practices laws. It is committed to providing equal employment opportunities to qualified individuals with disabilities, including disabilities related to pregnancy, childbirth, and related conditions. Consistent with this commitment, the MARC will provide reasonable accommodation to otherwise qualified individuals where appropriate to allow the

individual to perform the job's essential functions unless doing so would create an undue hardship on the business.

If you require accommodation because of your disability, it is your responsibility to notify Human Resources immediately.

You may be asked to include relevant information such as:

- A description of the proposed accommodation.
- The reason you need accommodation.
- How the accommodation will help you perform the essential functions of your job.

After receiving your request, Human Resources will engage in an interactive dialogue with you to determine the precise limitations of your disability and explore potential reasonable accommodations that could overcome those limitations. Where appropriate, we may need your permission to obtain additional information from your medical provider. All medical information received by MARC in connection with a request for accommodation will be treated as confidential. MARC encourages you to suggest specific reasonable accommodations that you believe would allow you to perform your job. However, MARC is not required to make the specific accommodation requested by you and may provide alternative accommodation to the extent any reasonable accommodation can be made without imposing undue hardship on the agency. If leave is provided as a reasonable accommodation, such leave may run concurrently with leave under the federal Family and Medical Leave Act and/or any other leave where permitted by state and federal law. MARC will not discriminate or retaliate against an individual for requesting accommodation.

### **Anti-Harassment and Complaint Policy**

MARC is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, MARC expects that all relationships among individuals will be business-like and free of bias, prejudice, and harassment.

MARC encourages reporting all perceived incidents of discrimination or harassment. It is the policy of MARC to promptly and thoroughly investigate such reports. MARC prohibits retaliation against any individual who reports discrimination or harassment or who participates in the investigation of such reports.

### **Sexual Harassment and Other Forms of Harassment**

#### **Title VI Policy Statement:**

MARC is committed to ensuring that no person is excluded from participation, denied benefits, or otherwise subjected to discrimination under any program or activity based on race, color, religious creed, age, marital status, familial status, national origin, ancestry, sex, gender identity or expression, intellectual disability, mental disability, learning disability, lawful source of income, or physical disability, including but not limited to blindness or deafness. Harassment of an employee by a supervisor or co-worker based on sex or inclusion in a protected class under law creates a harmful working environment and is illegal under state and federal law. MARC Community Resources will not tolerate harassment and will take immediate remedial action to correct and prevent harassment of its employees.

**Sexual Harassment:**

Harassment of an employee by a supervisor or co-worker based on sex creates a harmful working environment and is illegal under state and federal law. Our agency's policy is to maintain a working environment free from harassment, insults, or intimidation based on an employee's sex. Verbal or physical conduct by a supervisor or co-worker relating to an offensive work environment, unreasonably interfering with the employee's work performance, or adversely affecting the employee's employment opportunities is prohibited.

While it is difficult to define sexual harassment precisely, it does include any 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 individual's employment;
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Although not an exhaustive list, the following are examples of the type of conduct prohibited by the policy against sexual harassment:

- Unwelcome sexual advances from a co-worker or supervisor, such as unwanted hugs, touches, or kisses;
- Unwelcome attention of a sexual nature, such as degrading, suggestive or lewd remarks or noises;
- Dirty jokes, derogatory or pornographic posters, cartoons or drawings; and
- The threat or suggestion that continued employment advancement, assignment, or earnings depend on whether or not the employee will submit to or tolerate harassment.

**Complaint Procedure:**

Any infraction of the Title VI Policy statement or the Sexual Harassment policy by supervisors or co-workers should be reported immediately to Human Resources or any supervisor. The attached form, [Title VI Complaint Form](#), will be used to document the initial complaint, and all complaints will be documented on the [Section VI Complaint Log](#). MARC will keep such reports or complaints confidential to the extent possible on a strict need-to-know basis. All reports or complaints will be thoroughly investigated by Human Resources or an external investigation agency within thirty (30) days of receipt. The investigator will consult with all individuals reasonably believed to possess information relevant to the allegation and possible victims of similar conduct.

The investigator will make a written report summarizing the investigation results and proposed disposition of the matter. Human Resources and the President/CEO shall determine the final disposition after reviewing all relevant evidence, including the investigator's summary report. The complainant will be notified in writing regarding the investigation results and the final disposition of the complaint, including any proposed remedial action.

If the complainant is dissatisfied with the decision, they may file a grievance under MARC's grievance procedure with five (5) working days of being notified of the decision. For bargaining unit employees,

please refer to the specific language under grievances in your contract with 1199. Or they may at any point in time pursue other avenues of redress open to him/her listed below.

Retaliation against any employee for complaining about sexual harassment or any form of harassment is prohibited under this policy and illegal under state and federal law. Violations of this policy will not be permitted and may result in discipline up to and including discharge from employment. Individuals who engage in acts of sexual harassment or other forms of harassment may also be subject to civil and criminal penalties.

Any MARC employee who believes that he or she has been harassed in the workplace in violation of this policy may file a complaint by contacting Human Resources:

**Donnalynn Notaro, Vice President of Human Resources**  
**25 Industrial Park Road, Middletown, CT 06457**  
**(860) 342-0700 x120 donnalynn.notaro@marc-cr.org**

Employees may also file a complaint directly with the **Commission on Human Rights and Opportunities and/or the Connecticut Department of Transportation's Division of Contract Compliance** (see below). Connecticut law requires that a formal written complaint be filed with the Commission on Human Rights and Opportunities within 180 days of the date when the alleged harassment occurred. Remedies for sexual harassment and other forms of harassment include cease and desist orders, back pay, compensatory damages, hiring, promotion, or reinstatement. If you would like to access the Commission on Human Rights and Opportunities website for general information, frequently asked questions, or how to file a complaint, you may do so at <http://www.ct.gov/chro>.

**The Commission's Administrative Headquarters are located at:**

25 Sigourney Street  
Hartford, CT 06106  
860/ 541-3400  
Connecticut Toll-Free 1-800/ 477-5737  
TDD 860/ 541-3459  
FAX 860/ 246-5068

**To file a complaint directly with the Human Rights and Opportunities, see below.**

For Portland:  
EASTERN REGION OFFICE  
100 Broadway  
Norwich, CT 06360  
PHONE: (860) 886-5703  
FAX: (860) 886-2550  
TDD: (860) 886-5707

For Cromwell & Middletown:  
WEST CENTRAL REGION OFFICE  
Rowland State Government Center  
55 West Main Street, Suite 210  
Waterbury, CT 06702-2004  
PHONE: (203) 805-6530  
FAX: (203) 805-6559  
TDD: (203) 805-6579

**Connecticut Department of Transportation's Division of Contract Compliance:**

**Connecticut Department of Transportation**  
Attention: Debra Goss, Title VI Coordinator  
2800 Berlin Turnpike  
Newington, Connecticut 06111  
Email: [Debra.goss@ct.gov](mailto:Debra.goss@ct.gov)

**Complaint forms can be obtained online at the ConnDOT website.**

**A complaint may also be filed directly with Federal Transit Administration:**  
Office of Civil Rights  
Attention Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor – TCR  
1200 New Jersey Avenue,  
SE, Washington, DC 20590

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