Title VII Equal Employment Opportunity (EEO) Policy

Purpose

Community Counseling Center is committed to fostering a workplace that promotes fairness, equality, and respect for all individuals. This policy outlines our commitment to providing equal employment opportunities and complying with Title VII of the Civil Rights Act of 1964, as well as related federal, state, and local anti-discrimination laws.

Policy Statement

Community Counseling Center strictly prohibits discrimination, harassment, and retaliation against applicants and employees on the basis of any of the individual's protected characteristics (actual or perceived), including but not limited to:

- Race
- Color
- Creed
- Religion
- Sex or gender (including pregnancy, childbirth, related medical conditions, and lactation)
- Sexual orientation and gender identity
- National origin
- Age
- Disability
- Marital status
- Ancestry
- Citizenship status
- Genetic information
- Military service or veteran's status
- Any other characteristics protected by federal, state, or local laws and ordinances

This policy applies to all terms and conditions of employment. Employment decisions—including recruitment, hiring, promotion, compensation, benefits, training, discipline, layoffs, transfers, and termination—will be made based on merit, qualifications, and business needs, and not on any legally protected characteristic.

The agency is committed to a workplace free of discrimination, harassment and retaliation. These behaviors are unacceptable in the workplace and in any work-related settings such as remote work settings, business trips and agency sponsored social functions, regardless of whether the

conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party. In addition to being a violation of this policy, discrimination, harassment or retaliation based on any protected characteristic as defined by applicable federal, state, or local laws and ordinances also is unlawful.

Discrimination Defined. Discrimination under this policy generally means treating differently or denying or granting a benefit to an individual because of the individual's actual or perceived protected characteristic.

Religious Accommodation

The agency will reasonably accommodate an employee's or applicant's sincerely held religious beliefs or practices unless doing so would impose an undue hardship on business operations. Please refer to our Religious Accommodations Policy for additional information and guidance on how to request religious accommodation.

Anti-Harassment

Harassment based on any protected characteristic is strictly prohibited. This includes, but is not limited to:

- Unwelcome verbal, physical, or visual conduct, comments, or jokes that denigrates or shows hostility or aversion towards an individual based on or because of any actual or perceived protected characteristic, or has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment
- Sexual harassment (including unwelcome sexual advances, requests for sexual favors, and other verbal, physical, or visual conduct of a sexual nature)

Reporting Harassment:
Please refer to our Workplace Harassment Policy for additional information, including guidance on reporting workplace harassment.

Retaliation Prohibited

The agency prohibits retaliation against any individual for engaging in protected activity, including but not limited to:

- Reporting or filing a discrimination or harassment complaint
- Participating in an investigation
- Opposing discriminatory practices

Any act of retaliation will result in disciplinary action, up to and including termination.

Responsibilities

- **Employees:** Must comply with this policy and report any violations.
- **Managers/Supervisors/Directors:** Are responsible for enforcing this policy, modeling appropriate behavior, and promptly reporting any concerns.
- **Human Resources:** Will provide training, process complaints, ensure investigations are conducted, and maintain appropriate documentation.

Complaint Procedure

Employees who experience or witness any form of discrimination, harassment, or retaliation are encouraged to follow this procedure:

1. Complaints should be submitted as soon as possible after an incident has occurred to Human Resources.
2. Reports can be made verbally or preferably in writing and should include as much detail as possible (names, dates, description of behavior, witnesses, etc.).
3. Complaints will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation.
4. Human Resources will initiate an investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred.
5. If necessary, the complainant and the respondent will be separated during the course of the investigation, either through internal transfer or administrative leave.
6. During the investigation, Human Resources may interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.
7. Upon conclusion of the investigation, Human Resources will submit a written report of their findings to the CEO, or the COO, during the CEO's absence. The investigation report and any statements submitted by the complainant or respondent will be reviewed to determine the appropriate corrective action (if any).
8. Once a final decision is made, Human Resources will meet with the complainant and the respondent separately and notify them of the findings of the investigation. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

9. If the investigation is inconclusive or if it is determined that there has been no violation of policy, but potentially problematic conduct may have occurred, Human Resources may recommend appropriate preventive action.

Disciplinary Action

Violations of this policy may result in disciplinary action, up to and including termination of employment. Disciplinary measures will be determined on a case-by-case basis.

Legal Compliance

This policy is designed to comply with Title VII of the Civil Rights Act of 1964 and other applicable laws. Where state or local laws provide greater protections, Community Counseling Center will comply with those requirements.

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