



2353 Rice Street, Suite 240
Roseville, MN 55113
Phone: 651-788-7593
Fax: 651-788-7909
www.mnkaren.org
info@mnkaren.org
EIN: 30-0438142

Mission: To build on the strengths of refugee and immigrant communities and remove barriers to achieving economic, social, and cultural wellbeing.

Harassment Prevention

It is KOM's policy to prohibit intentional and unintentional harassment of or against job applicants, contractors, interns, volunteers, or employees by another employee, supervisor, vendor, supplier, client, or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information or any other characteristics protected by applicable federal, state or local laws (referred to as “protected characteristics”). Such conduct will not be tolerated by KOM.

The purpose of this policy is not to regulate our employees' personal morality, but to ensure that no one harasses another individual in the workplace, including while on KOM premises, while on KOM business (whether or not on KOM premises), or while representing KOM. In addition to being a violation of this policy, harassment or retaliation based on any protected characteristics as defined by applicable federal, state, or local laws also is unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment as defined by applicable federal, state, or local laws are unlawful.

Voice mail and electronic communications (such as email and Internet use, including social media) are covered by this policy in the same manner as other communications and actions.

Harassment Defined

Harassment generally is defined in this policy as unwelcome verbal, visual, or physical conduct that denigrates or shows hostility or aversion towards an individual 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.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures, or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or emails), or physical conduct (including physically threatening another, blocking someone's way, etc.). Such conduct violates this policy, even if it does not rise to the



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level of a violation of applicable federal, state, or local laws. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

Sexual Harassment Defined

Sexual harassment can include all of the above actions, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities, and other verbal, visual or physical conduct of a sexual nature when:

- Submission to that conduct or those advances or requests is made either explicitly or implicitly a term or condition of an individual's employment; or
- Submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or
- The conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment

Examples of conduct that violate this policy include, but are not limited to:

- Unwelcome flirtations, leering, whistling, touching, pinching, assault, blocking normal movement;
- Requests for sexual favors or demands for sexual favors in exchange for favorable treatment;
- Obscene or vulgar gestures, posters, or comments;
- Sexual jokes or comments about a person's body, sexual prowess, or sexual deficiencies;
- Propositions or suggestive or insulting comments of a sexual nature;
- Derogatory cartoons, posters, and drawings;
- Sexually explicit emails, text messages, or voicemails;
- Uninvited touching of a sexual nature;
- Unwelcome sexually related comments;
- Conversation about one's own or someone else's sex life;
- Conduct or comments consistently targeted at only one gender, even if the content is not sexual; and
- Teasing or other conduct directed toward a person because of the person's gender.



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Complaint Procedure

Employee Responsibility: Employees who become aware of or are subject to unlawful discrimination or harassment should immediately notify one of KOM's Executive Directors. If it is not possible or practical to notify an Executive Director, employees should notify the Chairperson of KOM's Board of Directors. KOM may ask that complaints be put in writing and signed by the complainant, to facilitate the investigation process. In addition, for employees who are comfortable doing so, telling the person who is engaging in inappropriate behavior to stop is often the most effective way to stop objectionable behavior.

Supervisor Responsibility: Supervisors who become aware of any incidents or alleged incidents of unlawful discrimination or harassment must immediately report them in the manner set forth above. Supervisors who receive complaints of discrimination or harassment must consult one of the KOM Executive Directors before undertaking an investigation or other action. Any supervisor who fails to report allegations of discrimination, harassment, or other prohibited conduct or who otherwise fails to deal properly with such allegations may be subject to discipline, up to and including termination.

Investigation & Response: KOM will take prompt action to investigate allegations of unlawful discrimination or harassment. Based upon its investigation, KOM will take immediate and appropriate disciplinary action. Any employee found to have engaged in discrimination, harassment, or other prohibited conduct will be subject to appropriate discipline up to and including termination of employment. Immediate and appropriate steps will also be taken if any non-employee (such as a vendor, supplier, or client) is found to have unlawfully discriminated against or harassed any employee of KOM.

Confidentiality & Non-retaliation: Reports of discrimination or harassment will be kept confidential to the extent possible, consistent with the need for a thorough investigation. KOM will not retaliate or take any form of reprisal against any victim of or witness to discrimination or harassment, and any such retaliation or reprisal by a KOM employee is forbidden. Any employee who retaliates against another employee or witness because of a good faith complaint of discrimination or harassment, or because of good faith participation in any investigation, may be subject to discipline, up to and including termination of employment. KOM encourages employees to report any incident of possible discrimination or harassment.



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Any employee who feels they have been a victim of illegal or sexual harassment as described above should follow the above Complaint Procedure with the assurance that no reprisals(retaliation) or otherwise adverse action will be taken against the employee.

It is also the responsibility of anyone who experiences or observes illegal or sexual harassment, discrimination, or retaliation to bring the matter to the attention of any member of management.

It is the responsibility of management to bring all complaints or observation of illegal or sexual harassment, discrimination, or retaliation to the attention of an Executive Director and/or the Chairperson of the Board of Directors so that an investigation can be immediately commenced.

Employees who knew of information about illegal or sexual harassment, discrimination, or retaliation, but did not notify an appropriate person consistent with this procedure, could be subject to disciplinary action, up to and including termination of employment.

Karen Organization of Minnesota expects the cooperation of all employees in making this policy work. KOM's intent in preparing, implementing, and distributing this policy is to help ensure compliance with federal, state, and local laws. This policy is not intended to impose any contractual obligations on KOM or any of its employees or representatives. Questions about this policy should be directed to an Executive Director.