COMBINED JEWISH PHILANTHROPIES OF GREATER BOSTON, INC.
POLICY AGAINST HARASSMENT

Article I. Purpose

Combined Jewish Philanthropies of Greater Boston, Inc. ("CJP") is committed to providing an environment that is free of sexual and other harassment based on sex, race, or any other personal characteristic protected under federal or state law. This Policy Against Harassment (the “Policy”) is intended to describe the conduct that is prohibited by CJP. Any director, officer, or member of the Audit Committee, CareGroup/CJP Board of Managers, CJP Investment Committee, Committee on Budget and Administration, Committee on Development, Organizational Development Committee, Governance and Nominating Committee, Commission on Strategic Priorities, or any such other committees as the CJP Board of Directors (the “Board”) may from time to time establish (each, a “Standing Committee”) who engages in prohibited discrimination or harassment, will be subject to discipline up to and including removal from his or her leadership position.

Article II. Definition of Sexual Harassment

CJP prohibits unlawful sexual harassment. Sexual harassment refers to any type of behavior of a sexual nature, intentional or unintentional, that is unwelcome and that has the purpose or effect of creating an environment that is hostile, offensive, intimidating or humiliating. Sexual harassment means sexual advances, requests for sexual favors, and/or conduct of a sexual nature when: (1) submission to or rejection of such advances, requests or conduct is made, either explicitly or implicitly, (a) a term or condition of employment or service as an officer, director, or Standing Committee member or (b) the basis for an employment, election, or appointment decision; or (2) such conduct has the purpose or effect of interfering with work, professional performance or service, or creating an intimidating, hostile, humiliating or sexually offensive work or professional environment.

The legal definition of sexual harassment is broad and includes other sexually oriented conduct that is unwelcome and has the effect, whether intended or not, of creating an environment that is hostile, offensive, intimidating, or humiliating. While it is not possible to list all of the circumstances that may constitute sexual harassment, the following are some examples of conduct which, if unwelcome, may constitute sexual harassment, depending on the circumstances, including the severity of the conduct and its pervasiveness:

- Sexual advances, whether they involve physical touching or not
- Epithets or jokes of a sexual nature, written or oral references to sexual conduct, discussion of one’s sex life or comments about an individual’s sexual prowess, deficiencies or activity
- Display of objects, pictures or cartoons of a sexual nature
- Leering, whistling or physical touching of another’s body
- Repeatedly asking an employee, officer, director, or standing committee member for a date after such individual has said no.
Article III. Other Harassment

CJP also prohibits other forms of unlawful harassment. For purposes of this Policy, other harassment is defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of the individual’s race, color, gender, pregnancy, age, religion, national origin, ancestry, sexual orientation, gender identity, physical or mental disability, veteran status, military service, application for military service, genetic information, or any other characteristic protected by law, and that:

- has the purpose or effect of creating an intimidating, hostile or offensive environment, or
- has the purpose or effect of unreasonably interfering with an individual’s work, contribution or performance.

Some examples of such harassment are: using epithets or slurs or making jokes or pranks that focus on a protected characteristic; and circulating or displaying written or graphic material that denigrates or shows hostility or aversion toward a person or group because of a protected characteristic.

Article IV. Complaints of Harassment and/or Retaliation

The responsibility to investigate complaints of sexual or other harassment by a director, an officer, or a Standing Committee member has been assigned to the CJP Human Resources Department. If you experience or witness sexual or other harassment, you should immediately report it to the CJP Human Resources Department, the Chair of the CJP Board of Directors or the CJP Whistleblower Hotline, as appropriate. Directors, officers, and Standing Committee members should not allow an inappropriate situation to continue by not reporting it. Any director, officer, or Standing Committee member receiving a report of sexual or other harassment is required to immediately report it to the CJP Human Resources Department, the Chair of the CJP Board of Directors or the CJP Whistleblower Hotline, as appropriate.

CJP strictly prohibits retaliation against any director, officer, or Standing Committee member in connection with any report of harassment. If you believe that you have been retaliated against in connection with any report of harassment, you should immediately report such conduct to the CJP Human Resources Department, the Chair of the CJP Board of Directors or the CJP Whistleblower Hotline. Any director, officer, or Standing Committee member receiving a report of retaliation is required to immediately report it to the CJP Human Resources Department, the Chair of the CJP Board of Directors or the CJP Whistleblower Hotline, as appropriate.

Article V. Investigations

Upon receipt of a complaint of harassment, CJP will promptly conduct a thorough investigation in such a way as to maintain your confidentiality to the extent possible under the circumstances. All directors, officers, and Standing Committee members are expected to cooperate with internal investigations. Any
director, officer, or Standing Committee member who is found to have harassed an employee of CJP, a director, an officer, or a Standing Committee member may be subject to disciplinary action, up to and including immediate removal from the individual’s respective position as a director, an officer, or a Standing Committee member. CJP also will take appropriate corrective action to address harassment by individuals who are not employees, directors, officers, or Standing Committee members.

**Article VI. State and Federal Agencies**

The following is a list of state and federal government agencies that enforce employment discrimination laws:

*Massachusetts Commission Against Discrimination (“MCAD”)*

One Ashburton Place 436 Dwight Street, Suite 220
Boston, MA 02108 Springfield, MA 01103
(617) 994-6000 (413) 739-2145

455 Main Street, Room 100 800 Purchase Street, Room 501
Worcester, MA 01608 New Bedford, MA 02740
(508) 799-8010 (508) 990-2390

*United States Equal Employment Opportunity Commission (“EEOC”)*

475 John F. Kennedy Federal Building
Government Center
Boston, MA 02203-0506
(617) 565-3200

**Article VII. Offensive Conduct**

Offensive conduct, while not unlawful, is not appropriate in the workplace, a professional environment, or a CJP-related event. Therefore, CJP prohibits conduct that a reasonable person would find offensive and unrelated to CJP’s legitimate business interests, even if such conduct is not related to any protected characteristic.

Examples of prohibited offensive conduct include: repeated verbal abuse, such as the use of derogatory remarks and insults; repeated comments or banter that insult or disparage an individual or group; verbal or physical conduct that a reasonable person would find threatening or intimidating; persistent, malicious mistreatment that degrades or humiliates an employee, director, officer, or Standing Committee member; personal attacks (i.e., angry outbursts, excessive profanity, or name-calling); unreasonable interference with an employee’s, director’s, officer’s, or Standing Committee member’s ability to do his or her work or to fulfill his or her duties; and deliberate sabotage or undermining of a
person’s work or performance. A single act usually does not constitute offensive conduct, unless that single act is severe and egregious.

CJP strongly encourages directors, officers, and Standing Committee members to promptly report offensive conduct. Directors, officers, and Standing Committee members always should feel free to ask anyone who is engaging in offensive conduct to stop. In addition, if you feel that you have seen or been the victim of offensive conduct, please report such conduct to the CJP Human Resources Department, the Chair of the CJP Board of Directors or the CJP Whistleblower Hotline, as appropriate.