

ACCENT POLICY AGAINST HARASSMENT

I. Purpose of Policy

ACCENT is committed to providing programs and a workplace free of sexual harassment (which includes harassment based on gender, pregnancy, childbirth, or related medical conditions), as well as harassment based on such factors as race, color, creed, national origin, ancestry, age, physical disability, mental disability, medical condition, marital status, sexual orientation, family care or medical leave status, veteran status, or any other basis protected by law.

ACCENT will not tolerate harassment by its employees or non-employees with whom ACCENT employees have a business, service, or professional relationship, including program participants. ACCENT strongly disapproves of and will not tolerate harassment of employees by managers, supervisors, or co-workers.

II. Harassment Defined

Harassment includes [verbal, physical, and visual conduct that creates an intimidating, offensive, or hostile working environment or that interferes with a person's performance or infringes on a person's rights]. Such conduct constitutes harassment when (1) submission to the conduct is made either an explicit or implicit condition of the program experience or employment; (2) submission to or rejection of the conduct is used as the basis for a program or employment decision; or (3) the harassment interferes with a person's program or work performance or creates an intimidating, hostile, or offensive program or work environment.

Harassing conduct can take many forms and may include, but is not limited to, the following: slurs, jokes, statements, gestures, assault, impeding or blocking another's movement or otherwise physically interfering with normal social or work activities, pictures, drawings, or cartoons based upon a person's sex, race, color, national origin, religion, age, physical disability, mental disability, medical condition, ancestry, marital status, sexual orientation, family care or medical leave status, veteran status, or any other basis protected by law.

Sexually harassing conduct in particular may include all of these prohibited actions, as well as other unwelcome conduct, such as requests for sexual favors, conversation containing sexual comments, and other unwelcome sexual advances. Sexually harassing conduct can be by a person of either the same or opposite sex.

III. Reporting And Investigating Harassing Conduct

ACCENT understands that victims of harassment are often embarrassed and reluctant to report acts of harassment for fear of being blamed, concern about being retaliated against, or because it is difficult to discuss sexual matters openly with others. However, no person should have to endure harassing conduct, and ACCENT therefore encourages program participants and employees to promptly report any incidents of harassment so that corrective

action may be taken. Any incidents of harassment, including work-related harassment by any ACCENT personnel or any other person, should be reported to the appropriate ACCENT Center Director, the Executive Director of ACCENT, or ACCENT's General Counsel*, who is responsible for investigating harassment complaints. ACCENT staff who receive complaints or who observe harassing conduct should immediately inform the appropriate ACCENT Center Director, the Executive Director of ACCENT, or ACCENT's General Counsel* so that an investigation may be initiated.

Every reported complaint of harassment will be investigated thoroughly and promptly. Typically, the investigation will include the following steps: an interview of the person who lodged the harassment complaint to obtain complete details regarding the alleged harassment; interviews of anyone who is alleged to have committed the acts of harassment to respond to the claims; an interview of any person who may have witnessed, or who may have knowledge of, the alleged harassment. ACCENT will notify the person who lodged the harassment complaint of the results of the investigation. The investigation will be handled in as confidential a manner as possible consistent with a full, fair, and proper investigation.

IV. Corrective Action

ACCENT will not tolerate retaliation against any person for making a good faith complaint of harassment or for cooperating in an investigation. If harassment or retaliation is established, ACCENT will take corrective action. Corrective action may include, for example: training, referral to counseling, disciplinary action ranging from a verbal or written warning to expulsion from a program and/or residence, termination of employment, and possibly cooperating with governmental, legal, and or academic institution officials, depending on the circumstances. With regard to acts of harassment by third parties, corrective action will be taken after consultation with individuals and institutions ACCENT deems to be appropriate.

* Reporting contacts as indicated in paragraph III:

ACCENT Paris Center Director: Melissa Smith-Simonet, tel. +33 (1) 53 02 01 30

ACCENT Florence Center Director: Michelangelo D'Elia, tel. +39 (055) 267 0501

ACCENT London Center Director: Matthew Erskine, tel. +44 (020) 76 37 75 18

ACCENT Madrid Center Director: Vanessa Rodriguez, tel. +34 (91) 308 5979

ACCENT Rome Center Director: Erin Nester, tel. +39 (06) 9799 8673

Director of U.S. Operations, ACCENT: Allison Keith, tel. (415) 835-3744

Director of European Operations, ACCENT: Stephen Conger, tel. +39 (06) 9799 8673

Executive Director, ACCENT: Ray Vernon, tel. +33 (1) 53 02 01 30

ACCENT's General Counsel: Mark K. de Langis, tel. (415) 472-3892