



West Bay Construction, Inc.

133 Pleasant Avenue
Absecon, NJ 08201
Phone (609) 380-7065
Fax (609) 573-5955
info@westbayinc.net

January 6, 2014

CORPORATE POLICY ON SEXUAL HARASSMENT

PURPOSE:

The purpose of this Policy is to explain the Company's position and practice with regard to sexual harassment in the workplace.

STATEMENT:

The Company condemns sexual harassment in the workplace and acknowledges that such conduct violates Title VII of the Civil Rights Act of 1964.

DEFINITION:

Under this policy, sexual harassment will be deemed to occur when:

1. submission to such conduct is made either explicitly or implicitly a term or condition of a person's employment;
2. submission to such conduct or rejection of such conduct by a person is used as a basis for employment decisions affecting the person; or
3. such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment. Such an abusive work environment, even one that does not seriously affect an employee's psychological well-being, can and often will, detract from an employee's job performance, discourage employees from remaining on the job, or keep them from advancing their careers.

Sexual harassment will be analyzed by WEST BAY CONSTRUCTION, INC., in light of the following type of conduct:

1. Nonverbal conduct, such as leering, whistling or the exhibition of offensive photographs, drawings, or other printed materials;
2. Verbal conduct, such as suggestive comments, jokes, language, as well as rumors and innuendo; or
3. Physical conduct, such as touching, pinching, brushing up against another person and assault.

An employee who believes that he or she has been sexually harassed should report the harassment. See attached "Procedures for Matters Regarding Sexual Harassment" and "Sexual Harassment Complaint Form".



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All complaints of sexual harassment will be handled confidentially and investigated with due care. The complaining employee, harasser and any witnesses will be interviewed.

GENERAL:

1. In all cases involving charges of sexual harassment, all parties involved will be given the utmost protection of privacy.
2. All members of management are held accountable for the effective administration of this policy.
3. Intimidation, coercion, threatening, taking reprisal or discrimination against any employee for complaining about harassment as described in this policy, is prohibited.

Frank Corradetti, PE
President/Corporate EEO Officer