

**AMITY TOWNSHIP ATHLETIC CLUB, INC.**  
**ANTI-DISCRIMINATION POLICY**

Introduction

The Amity Township Athletic Club, Inc. (hereinafter referred to as “Company”) is committed to maintaining an environment free of all forms of harassment, intimidation, and discrimination. The information provided below describes the Company’s policy with regard to sexual and discriminatory harassment on the basis of race, color, gender, religion, national origin, ancestry, age, disability or any other protected characteristic. This policy also explains the processes, both informal and formal, through which complaints of harassment may be brought forward.

Under no circumstances will the Company tolerate behavior which creates an unacceptable working environment. Individuals found to have engaged in misconduct constituting sexual or other discriminatory harassment will be subject to discipline, up to and including discharge, from the Company.

These policies apply to all employees and contractors working for the Company or on the Company’s premises.

Sexual Harassment Prohibited

Sexual harassment is a form of discrimination and constitutes a serious violation of Company policy. The Company will not tolerate sexual harassment by any employee or contractor of the Company.

Sexual Harassment Defined

The term “sexual harassment” refers to any unwanted sexual advances, requests for sexual favors, and other verbal, visual or physical conduct of sexual nature when:

1. Submission to or rejection of such conduct is made implicitly or explicitly a term or condition of employment or participation in any Company activity; or
2. Submission to or rejection of such conduct by an individual is used as a basis for personnel decisions affecting the individual; or
3. Such verbal, visual or physical conduct has the purpose or effect of unreasonably interfering with an individual’s work performance; or
4. Such verbal or physical conduct has the purpose or effect of creating an intimidating, hostile or offensive environment.

Examples of Sexual Harassment

Examples of verbal, visual or physical conduct prohibited by the Company’s policy on sexual harassment include, but are not limited to:

1. Physical assault;
2. Direct or implied threats that submission to sexual advances will be a condition of employment, work status, promotion, or letters of reference;
3. Unwelcome flirtations, propositions, or advances;

4. Unwelcome physical contact;
5. Whistling, leering, improper gestures or offensive remarks, including unwelcome comments about appearance, sexual jokes or other inappropriate use of sexually explicit or offensive language; and
6. Displays of sexually suggestive objects or pictures.

#### Other Discriminatory Harassment Prohibited

Harassment on the basis of race, color, gender, religion, national origin, ancestry, age, disability or any other characteristic protected by law is also a form of discrimination and can have a deleterious affect in work performance. The Company will not tolerate harassment by any member of the Company.

#### Other Discriminatory Harassment Defined

For the purposes of this policy, other harassment is defined as verbal, visual or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, gender, religion, national origin, ancestry, age, disability or any other characteristic protected by law, or that of his/her relatives, friends, or associates and that:

1. Has the purpose or effect of creating an intimidating, hostile, or offensive work environment; or
2. Has the purpose or effect of unreasonably interfering with an individual's work performance; or
3. Otherwise adversely affects an individual's employment opportunities.

#### Examples of Other Discriminatory Harassment

Examples of verbal or physical conduct prohibited by the Company's policy include, but are not limited to:

1. Use of epithets, slurs, negative stereotypes;
2. Threatening, intimidating or engaging in hostile acts that relate to a protected characteristic, including purported jokes/pranks;
3. Display of written or graphic material that denigrates or shows hostility or aversion toward a person or group because of a protected characteristic.

#### Non-Retaliation

The Company strongly encourages the prompt reporting of all incidents of sexual or other discriminatory harassment. The procedures for doing so are described in the sections below.

Fear of retaliation should not be a barrier to reporting incidents of harassment. Retaliation in any form is a serious violation of this policy and will not be tolerated. Any incidents of retaliation should be reported immediately. The reporting and investigation of allegations of retaliation will follow the procedures set forth in this Policy. Any person found to have retaliated against an individual for reporting sexual or other discriminatory harassment will be subject to the Company's disciplinary procedures.

### Reporting Sexual or Other Discriminatory Harassment

Any employee who believes that he or she is being or has been harassed or who believes that a co-employee is being or has been harassed should notify his or her supervisor and/or any member of the Company's Board of Directors.

When a report of harassment is made as specified above, the Company's Board of Directors will undertake a prompt investigation as may be appropriate under all of the circumstances. The steps to be taken during the investigation cannot be fixed in advance but will vary depending upon the nature of the allegations. Confidentiality will be maintained throughout the investigatory process to the extent practicable and consistent with the Company's need to undertake a full investigation.

The Company will take appropriate action based on the results of its investigation. Any employee who is found to have engaged in prohibited sexual harassment or other discriminatory harassment will be subject to appropriate disciplinary action, up to and including termination of employment.