

TO: ALL EMPLOYEES

FROM: VIRGIL L. STRICKLER, GENERAL MANAGER

DATE: JULY 1, 2014

SUBJECT: ANTI-DISCRIMINATION AND ANTI-HARASSMENT POLICY

It is the policy of the Ohio Expositions Commission (OEC) to prohibit discrimination and harassment of applicants and employees, due to race, color, religion, gender, national origin (ancestry), military status (past, present or future), disability, age (40 years or older), genetic information or sexual orientation. Harassment will not be tolerated in the Ohio Expositions Commission's workplace.

It is the policy of OEC to maintain a working environment free from any discrimination, and to prohibit harassment of its employees and applicants, including sexual harassment. Sexual harassment is any unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature by a superior, subordinate or peer. Any employee or applicant who believes that she or he has been subject to sexual harassment should advise the offending individual that the action is not welcome and must stop. The aggrieved individual must then report such incident(s) to either her or his supervisor, the agency's EEO and Diversity Manager, HR Administrator or the Equal Opportunity Division.

Any managerial or supervisory employee who receives a report of discrimination or harassment must either 1) request a written statement from the victim; or 2) confirm the substance of such statement in writing and document the date the report was received. Regardless of whether a written report is received from the alleged victim, managers and/or supervisors must immediately report such complaints to the EEO and Diversity Manager or the HR Administrator. Such reports cannot be kept strictly confidential, however, information concerning allegations shall be managed discretely and communicated to others only as is necessary to investigate and take appropriate disciplinary action. There shall be no retaliation against an employee for reporting allegations of discrimination or harassment or other inappropriate behavior. Retaliatory actions will also be subject to investigation and possible discipline.

INTERNAL RESOLUTION OF A CLAIM

All allegations of discrimination or harassment must be reviewed. The OEC's internal policy requires that complaints made to the EEO and Diversity Manager or to the HR Administrator will be reviewed for timeliness. Formal complaints must be filed within 30 days of the most recent incident of alleged discrimination or harassment. When appropriate, all efforts will be made to seek an internal resolution of claims. Such complaints will be investigated promptly and thoroughly. A rapid determination will be made of what, if any, corrective action is warranted by possible violations of the Anti-Discriminatory and Anti-Harassment Policy. The decision to pursue a remedy utilizing the agency's internal complaint process will be made in conjunction with the individual filing the allegations. All allegations of discrimination and harassment will be investigated regardless of timeliness. Incident reports by managers and supervisors should be made immediately.

FILING A FORMAL COMPLAINT

Formal complaints may be filed with any or all of the following enforcement agencies:

- (1) Department of Administrative Services' Equal Opportunity Division within 30 days of the most recent incident of alleged discrimination or harassment
- (2) Ohio Civil Rights Commission within six months; and/or
- (3) federal Equal Employment Opportunity Commission within 300 days

The EEO and Diversity Manager shall then conduct a formal investigation of the complaint. Within sixty (60) days from the filing of this complaint, the agency shall render a decision of whether there was probable cause and the appropriate remedy, if a remedy is required. The investigation time may be continued, depending on extenuating circumstances.

If the complainant is not satisfied with the agency's decision and/or resolution she or he may request a hearing through the Ohio Department of Administrative Services' Equal Opportunity Division. The Equal Opportunity Division will select a hearing officer to preside over and render a decision on the case. The agency shall have thirty (30) days to act on the decision of the hearing officer, if any action is required. The complainant may request a final review and decision from the State Equal Opportunity Coordinator if he/she is not satisfied with the decision of the hearing officer.

ENFORCEMENT

Discrimination and harassment will not be tolerated. Such conduct is subject to discipline, up to and including termination. Supervisory employees are advised that they may be subject to personal liability for acts of discrimination and harassment and may be responsible for their own legal defense.

Harassment, discrimination and related behavior in the workplace are inappropriate, and will not be tolerated. This policy supports the objectives and practices of the State of Ohio and is in conjunction with applicable Federal and State laws and regulations as well as Executive Order 99-25T. This policy will be disseminated to all employees annually and will be included in employee orientation materials.

Any employee or applicant for employment with the Ohio Expositions Commission who believes she/he has been a victim of harassing or discriminatory conduct, or who has questions concerning this policy should contact:

Susan W. Weyrick
EEO and Diversity Manager
Ohio Expositions Commission
717 East 17th Avenue
Columbus, Ohio 43211
Telephone (614) 466-6520