



Workplace Harassment and Bullying Policy

Policy Statement

BBK Consulting, Inc. (the Company) is committed to providing a work environment where all individuals are treated with dignity and respect. The Company will make every effort to provide a safe and healthy work environment. All supervisors and workers must be dedicated to zero-tolerance of harassment and bullying in the workplace. This policy applies to all workers and sources of harassment such as co-workers, clients, employers, supervisors, customers, and members of the public.

The Company will act in compliance with the Washington State Department of Labor and Industries guidelines – taking every reasonable precaution to protect its employees.

Purpose

The purpose of this document is to outline the definitions of harassment and bullying and to explain our company's harassment complaint procedures that are to be followed by employees and management.

Definition

Workplace harassment means:

- a) Engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or
- b) Workplace sexual harassment;

Harassment may be verbal, physical, deliberate, unsolicited, and unwelcome. It may be one incident or a series of incidents.

- **Personal Harassment**, which is based on personal characteristics, such as age, gender, and race.
- **Sexual Harassment**, engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

- **Psychological Harassment** is a course of conduct or pattern of degrading, disrespectful, rude, and unwelcome conduct that psychologically hurts or isolates a person in the workplace.

Harassment & bullying behavior can include (but is not limited to):

- Humiliation, initiation practices, or hazing.
- Spreading malicious rumors.
- Calling someone derogatory names.
- Displays of offensive, derogatory, or sexually explicit pictures, photographs, cartoons, drawings, symbols, and other material.
- Unwanted and unnecessary touching, patting, pinching, or another suggestive physical contact.
- Relentless criticism or belittling.
- Intimidating or offensive jokes or innuendos.
- Sending inappropriate messages via voicemail, e-mail, text messaging, or written correspondence.

Procedure

Responsibilities

Employer

- Inform workers of this policy statement and steps taken to prevent bullying and harassment.
- Train workers and supervisors on recognizing the potential for bullying and harassment, and procedures for responding to and reporting.
- Develop and implement procedures for dealing with incidents or complaints.
- Foster a workplace culture of dignity and respect.
- Review the policy on an annual basis and revise where necessary.

Managers

- Role model inclusive and professional behavior and not engaging in discriminatory behavior, bullying, and/or harassment.
- Ensure all employees are aware of, and understand the policy and regularly review it with their staff.
- Respond to complaints or to situations with potential for complaints.
- Investigate the complaint and follow the Harassment Complaint Procedure.
- Maintain the confidentiality of the individual's concerns, except where disclosure is necessary for the purpose of investigating the complaint or taking disciplinary measures in relation to the alleged complaint if discipline is being imposed.
- Ensure the known harassment ceases and that the appropriate resolution is in place.
- Management will be held responsible and subject to disciplinary measures up to and including termination if they do not respond to incidents of harassment.

Human Resources

- Promote appropriate workplace behavior.
- Act as an advisor to management on Harassment and Bullying Policy issues.
- Design and develop incident reports and investigation procedures.
- Provide advice and support to investigators and employees.
- Review the investigation reports and consider the facts to determine the outcome of the complaint.
- Inform the complainant and respondent, in writing, on the outcome of the investigation of the complaint.
- Impose discipline or takes other action, such as providing education to improve employees' understanding of harassment.
- Develop and implement Company policies and procedures on workplace harassment and bullying issues.
- Identify problem areas and solutions.

Employees

- Not engage in discriminatory behavior, bullying, and/or harassment.
- Report if bullying and/or harassment is observed or experienced.
- Comply with the employer's policies and procedures on harassment.
- Attend scheduled training sessions designed to familiarize them with this policy.

Harassment Complaint Procedure

Employees

Any employee who believes they have been subjected to harassment and/or bullying should:

- Make their objections known to the harasser if they are comfortable doing so.
- Keep a written record of the date, time, location, nature of the behavior, and names of any witnesses.
- If the harassment continues, or if the employee is not comfortable approaching the harasser, the employee should speak to their immediate supervisor. If the supervisor is the alleged harasser, the employee is encouraged to report workplace harassment and/or bullying to the Human Resources Representative. Employees will not have their careers affected in any way as a consequence of their complaint(s).
- Employees needing assistance or wanting to clarify issues before reporting a situation may contact the Human Resources Department for confidential consultation and advice.

Management

Management will investigate and deal with all complaints or incidents of workplace harassment & bullying in a fair and timely manner and follow these steps:

- Interview the complainant and alleged harasser within 48 hours from the receipt of the complaint. Involve Human Resources Department immediately.
- Interview the witness(es) or persons who may have knowledge of the circumstances.
- Document the situation accurately and completely.

- **Outline the complaint either verbally or in writing to the Human Resources Department.**
- **Do not disclose any relevant information regarding the complaint to anyone outside of those involved.**