

# Equal Employment Opportunity and Anti-Discrimination Policy

## I. OVERVIEW & SCOPE

Project Courage Foundation of 1201 SE 2nd Court, 208, Fort Lauderdale, Florida 33301, has established an Anti-Discrimination and Equal Employment Opportunity Policy ("Policy"). This Policy applies to all aspects of the relationship between Project Courage Foundation and its employees, including, but not limited to, employment, recruitment, advertisements for employment, hiring and firing, compensation, assignment, classification of employees, termination, upgrading, promotions, transfer, training, working conditions, wages and salary administration, and employee benefits and application of policies. These policies apply to independent contractors, temporary employees, all personnel working on the premises, and any other persons or firms doing business for or with Project Courage Foundation. Disciplinary action will be taken against any employee or agent in breach of this Policy.

## II. POLICIES

**1. DISCRIMINATION.** Project Courage Foundation is an equal opportunity employer committed to complying with all applicable anti-discrimination laws. Discrimination occurs whenever similarly situated individuals of a different group are accorded different and unequal treatment in the context of a similar situation. Project Courage Foundation shall not tolerate, under any circumstances, without exception, the exclusion of individuals from an opportunity or participation in any activity because of race, color, gender, gender identity, sexual orientation, religion, national origin, familial status, age, disability, United States military veteran status, and any other status protected by the law. This list is not exhaustive. Our policy of non-discrimination in employment applies, without limitation, to recruitment, hiring, compensation, promotions, transfers, discipline, demotions, terminations, layoffs, access to benefits and training and all other aspects of employment, as well as to selection of volunteers and vendors and provision of services. In addition, our policy of non-discrimination is intended to extend to visitors to our facilities and all of our stakeholders.

**2. HARASSMENT.** Project Courage Foundation is committed to creating and providing a positive work environment that is free from harassment. Therefore, the Company will not tolerate workplace harassment of any employee, either by fellow employees or non-employees, of race, color, gender, gender identity, sexual orientation, religion, national origin, familial status, age, disability, United States military veteran status, sexual orientation, gender identity and gender expression, including the exercise of a protected activity (like filing a complaint), or any other reason deemed impermissible under the law.

Harassment can include, but is not limited to, offensive verbal conduct such as foul or obscene language, epithets, suggestive statements or innuendo, derogatory comments, or "jokes." Harassment may further include touching, gestures, or other offensive physical conduct, or creating, displaying, or reading offensive graphic or written materials in the workplace that relate to the sex, race, religion, color, national origin, age, or disability of an employee. Any of these behaviors is considered harassment if it would make a reasonable person experiencing the conduct uncomfortable in the workplace, or if it could hinder the person's job performance.

All employees, including supervisors, other management personnel, and independent contractors, are required to abide by this Policy. Violation of the Policy will result in disciplinary action, up to and including discharge. No person will be adversely affected in employment with Project Courage Foundation as a result of bringing complaints of harassment.

**3. SEXUAL HARASSMENT.** Project Courage Foundation is strongly opposed to sexual harassment, and that such behavior is prohibited both by law and by company policy. Sexual harassment is unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute harassment when (1) submission to such conduct is made either explicitly or implicitly a term or condition of employment; (2) submission to or rejection of such conduct by an individual is used as a basis for employment decisions, promotion, transfer, selection for training, performance evaluations, benefits, or other terms and conditions of employment; or (3) such conduct has the purpose or effect of creating an intimidating, hostile, or offensive work environment or substantially interferes with an employee's work performance. Project Courage Foundation prohibits inappropriate conduct that is sexual in nature at work, on Company business, or at Company-sponsored events including the following: comments, jokes, degrading language, sexually suggestive objects, books, or any form of media electronic or in print form. Sexual harassment is prohibited whether it is between members of the opposite sex or members of the same sex.

**4. STATEMENT ON AFFIRMATIVE ACTION.** An affirmative action program has been developed where Project Courage Foundation seeks to increase the representation and participation of minorities.

**5. REPORTING DISCRIMINATION & HARASSMENT.** If an employee feels that he or she has been harassed as described in this Policy, they should immediately report the matter to management or to John Walsh through any verbal or written means. If that contact is not available, or if the employee is not comfortable informing this contact, the employee should immediately inform any other manager or supervisor. Once the matter has been reported it will be promptly investigated. The investigation will be conducted in a confidential manner to the extent consistent with the need to investigate and evaluate the complaint. The procedure for reporting incidents of discriminatory or harassing behavior is not intended to prevent the right of any employee to seek a remedy under available state or federal law by immediately reporting the matter to the appropriate state or federal agency.

**6. NO RETALIATION.** No retaliatory action will be taken against any person who in good faith reports conduct that she or he believes may violate this Policy. No retaliatory action will be taken against any individual for assisting or participating in an investigation, proceeding or hearing related to a harassment complaint.

**7. DISCIPLINARY MEASURES FOR HARASSMENT.** Where an employee is determined to have violated this Policy, the Company will take disciplinary action, up to and including termination. Where a non-employee is determined to have violated this Policy, the Company will take action reasonably calculated to end the harassment.

**8. REMEDIES.** Remedies for any instances of verified employment discrimination, whether caused intentionally or by actions that have a discriminatory effect, may include back pay, hiring, promotion, reinstatement, front pay, reasonable accommodation, or other actions deemed appropriate by Project Courage Foundation. Remedies can also include payment of attorney's fees, expert witness fees, court costs and other applicable legal fees.

**9. POLICY IMPLEMENTATION.** Implementation of this Policy will be effective as of July 14, 2014.