

BROOKINGS

ANTI-HARASSMENT POLICY

The Brookings Institution is committed to providing an environment in which all individuals are treated with respect and dignity. Inappropriate behavior and harassment create conditions that are wholly inconsistent with this commitment. The purpose of this Policy is to maintain an environment that is free from discriminatory or harassing behavior.

This Policy applies to behavior in the Brookings work environment, including occurring before, during, or after any Brookings-related activities, regardless of whether on Brookings's premises or at another location (such as Brookings-sponsored events or travel).¹

This Policy also applies to Brookings staff, Brookings-affiliated individuals, as well as those involved Brookings-related activities, including:

- Brookings employees (as well as applicants for employment) and affiliates;
- Brookings independent contractors, including vendors and suppliers;
- Members of Brookings Board of Trustees (fiduciary and non-fiduciary);
- Members of Brookings International Advisory Council, Brookings Council, Brookings Society, Program Leadership Committees, and other related entities;
- Brookings donors; and
- Brookings guests and visitors.

Prohibited Conduct

This Policy prohibits discriminatory or harassing behavior directed toward a person because of his or her race, color, religion, sex, age, disability, national origin, ancestry, sexual orientation, marital status, personal appearance, citizenship status, family responsibilities, gender identity or expression, genetic information, matriculation, political affiliation, veteran status, and any other prohibited basis of discrimination as required by law ("Protected Characteristics").

Accordingly, no individual covered under this Policy shall engage in or facilitate any discriminatory or harassing behavior toward another person who is affiliated with Brookings or involved in activities related to the Institution, including engaging in any speech or conduct that is disparaging or derogatory of another person based upon any Protected Characteristics.

Harassment, including sexual harassment, will not be condoned or tolerated by Brookings.

¹ Given the presence of outside factors (such as locations, schedules, etc.), individuals should be additionally mindful of their behavior in informal business situations, including at Brookings-sponsored events and work-related travel.

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when submission to such conduct is either explicitly or implicitly made a term or condition of an individual's employment; submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual; or such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive working environment. Examples of sexual harassment include:

- threatening to take or taking employment actions—such as discharge, demotion, or reassignment—if sexual favors are not granted;
- demands for sexual favors in exchange for favorable or preferential treatment;
- unwelcome and repeated flirtations, propositions or advances;
- unwelcome physical contact;
- whistling, leering, or improper gestures;
- use of stereotypes;
- offensive, insulting, derogatory, or degrading remarks;
- unwelcome comments about appearance;
- sexual jokes or use of sexually explicit or offensive language;
- gender or sex-based pranks; and
- the display of sexually suggestive objects or pictures, including through e-mail.

Other harassment is defined as verbal or physical conduct that denigrates or shows hostility or aversion based on an individual's Protected Characteristics, that creates an intimidating, hostile, or offensive work environment or unreasonably interferes with an individual's work performance. Examples of other harassment include:

- using epithets or slurs;
- mocking, ridiculing, or mimicking another's culture, accent, appearance, or customs,
- threatening, intimidating, or engaging in hostile or offensive acts that focus on an individual's Protected Characteristics, including jokes or pranks; and
- displaying or circulating in the workplace (including via e-mail) written or graphic material that denigrates or shows hostility toward a person or group's Protected Characteristics.

The lists of examples above are not intended to be all-inclusive.

Reporting and Investigating Suspected Violations

Each individual is responsible for respecting the rights of others and creating a Brookings work environment free from discrimination and harassment.

When appropriate, Brookings encourages any individual who believes that he or she is being discriminated against, harassed, or has observed discrimination or harassment, to speak directly to the offending person about why he/she feels the behavior is inappropriate. This does not preclude individuals from speaking with others (e.g. a direct supervisor or Brookings Human Resources department).

Brookings requires prompt reports of any incident of discrimination or harassment in the Brookings work environment. As outlined in Brookings's Reporting, Investigations and Whistleblower policy, individuals may report suspected violations of this Policy to:

- Jacqueline Basile, VP and Chief HR Officer, jbasile@brookings.edu, (202) 797-6406;
- Michael Cavadel, VP and General Counsel, mcavadel@brookings.edu, (202) 797-6273; or
- Ted Gayer, Executive Vice President, tgayer@brookings.edu, (202) 797-6230.

If the suspected violations of this Policy relate to members of Brookings's Board of Trustees, individuals may report suspected violations to the Chair of the Board's Audit Committee, Bart Friedman (bfriedman@cahill.com), (212) 701-3304).

Individuals may also report suspected violations anonymously through:

- An Anonymous Reporting Website <http://brookings.ethicspoint.com>; or
- An Anonymous Reporting Hotline 1-866-329-5288.²

When reporting the matter, you should provide as much information as possible, including:

- The individual(s) involved in the suspected violation;
- The nature of the suspected violation, including which policies or laws you suspect were violated; and
- The information that leads you to believe that a violation has occurred.

Brookings will undertake a prompt investigation as may be appropriate under the circumstances. Brookings ensure that individuals reporting suspected violations in good faith, or participating in related investigations, will not face retaliation.

Violations

Violations of this policy may lead to discipline, up to and including termination of employment and/or affiliation with Brookings.

² The following individuals are notified when an anonymous report is submitted: Brookings's VP and General Counsel; VP and Chief Human Resources Officer; and Executive Vice President.