

## ANTI-DISCRIMINATION AND ANTI-HARASSMENT POLICY

Brookings is committed to providing a work 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 a work environment that is free from discriminatory or harassing behavior.

This policy applies to behavior in the Brookings work environment, including behavior occurring before, during, or after any Brookings-related activities, regardless of whether on Brookings premises or at another location (such as Brookings-sponsored events or travel or remote work locations when Brookings business is occurring).

Each individual is responsible for respecting the rights of others and creating a Brookings work environment free from discrimination and harassment. This policy applies to Brookings employees as well as those involved with Brookings-related activities, including:

- Applicants;
- Third-party employees (temporaries);
- Affiliates;
- Interns;
- 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.

In support of a work environment free of discriminatory or harassing behavior, training on this topic is provided to all new hire employees and interns within the requisite timeframes set forth in applicable municipal, county, state, and federal guidelines. Periodically Brookings employees receive additional instructor-led training.

## PROHIBITED CONDUCT

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This policy prohibits discriminatory or harassing behavior directed toward a person because of the individual's 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, union membership, veteran or military 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.

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, but are not limited to:

- 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 or social media.

Other harassment is defined as verbal or physical conduct that denigrates or shows hostility or aversion based on an individual's Protected Characteristics, which 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 individual'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 or social media) 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

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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 they are being discriminated against, harassed, or has observed discrimination or harassment, to speak directly to the offending person about why they feel the behavior is inappropriate. This does not preclude individuals from speaking with others (e.g., a direct supervisor or Human Resources).

Brookings employees, affiliates, contractors, and Trustees should report any suspected violations of this policy to one or more of the individuals outlined in the [Reporting, Investigations, and Whistleblower Policy](#). In addition, Brookings supervisors and Trustees are mandatory reporters and

must report any suspected violations in accordance with the [Policy](#). Suspected violations can be reported to, among other individuals, any Vice President, the Chief Human Resources Officer or the General Counsel ([GeneralCounsel@brookings.edu](mailto:GeneralCounsel@brookings.edu)), and can also be reported anonymously to <http://brookings.ethicspoint.com> or the reporting hotline at 1-866-329-5288. Brookings expressly prohibits retaliation against anyone who in good faith reports suspected misconduct consistent with this policy or participates in a related investigation.

## VIOLATIONS

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