

GATEWAY PROGRAM DEVELOPMENT CORPORATION POLICY PROHIBITING WORKPLACE VIOLENCE

I. Introduction

This document sets forth the official policy of Gateway Program Development Corporation (GDC) prohibiting workplace violence and GDC's commitment to promoting a workplace environment free from violence, threats of violence, harassment, intimidation, and disruptive behavior of a violent or intimidating nature.

II. Policy

GDC prohibits workplace violence committed by or against its employees or consultants. Specifically, GDC will not tolerate violence, threats of violence, harassment, intimidation, or disruptive behavior of a threatening nature towards people or property. Threats or acts of violence include conduct against persons or property that is sufficiently severe, offensive, or intimidating to alter the conditions of employment, or to create a hostile, abusive or intimidating work environment for one or more employees, customers, or business partners. Complaints involving workplace violence will be given the serious attention they deserve. Individuals who violate this policy may be removed from GDC premises and will be subject to disciplinary and/or legal action up to, and including, termination of employment and/or criminal prosecution.

For purposes of this policy, workplace violence is defined as any actual or threatening behavior of a violent nature, as understood by a reasonable person, occurring on GDC property, regardless of the relationship between GDC and the individual involved. Therefore, workplace violence includes, but is not limited to, physical or verbal intimidation, harassment, or coercion that either arises out of or impacts the workplace.

III. Illustrative Examples

Examples of workplace violence include but are not limited to:

- Threatening, aggressive or hostile behavior (physical or verbal) that creates an objective reasonable fear of injury to another person or subjects another individual to emotional distress;
- The intentional destruction or threat of destruction of property owned, operated or controlled by another employee or consultant, or by GDC;
- Hitting or shoving an employee or consultant, with any part of one's body and/or with any object;
- Threatening to harm an employee or consultant, or his or her family, friends, associates, or property;
- Harassing or threatening with telephone calls, letters, emails, text messages or other written or electronic forms of communications, including social media;
- The willful, malicious and repeated following of another person, also known as "stalking";

- Possession of a weapon, any components which can readily be assembled into a weapon or any instrument utilized as a weapon, while on GDC premises or while on GDC business, unless specifically approved as a job-related requirement (e.g. Police Officer); and
- Suggesting to an employee or consultant that he or she engage in any of the preceding acts.

IV. Reporting Workplace Violence

Any employee or consultant who is the victim of or witness to an act of workplace violence should report it immediately to the General Counsel of GDC and/or take legally appropriate steps (such as contacting local law enforcement). Employees and consultants should also report the incident to a supervisor or manager as soon as possible, who are to act swiftly and, if practicable, with discretion to protect individual privacy. If managers and supervisors receive reports of workplace violence, they should also refer them immediately to the General Counsel's office. Reports shall be kept confidential to the extent possible.

Any individual making a false accusation or providing false information may be subject to administrative and disciplinary action, up to and including termination. Reports made in good faith, even if later found not to be substantiated, will not be considered a false accusation.

V. Retaliation

GDC prohibits retaliation of any kind against individuals who report a workplace violence incident or otherwise exercises rights as described in this policy. Individuals who believe they have been subjected to retaliation should report the conduct to the General Counsel's office. Appropriate administrative and disciplinary action, up to and including termination, may be taken against any individual found to have retaliated against a complainant, witness, or any other individual assisting GDC's investigation.

Adopted: September 28, 2018