

AMERICAN MARITIME OFFICERS EXECUTIVE BOARD
EQUAL EMPLOYMENT OPPORTUNITY/SEXUAL HARASSMENT POLICY

General Statement of Principles

American Maritime Officers (AMO's) policy has always been, and will continue to be, to ensure equal employment opportunity and to prohibit discrimination on the basis of race, color, religion, sex, sexual preference or orientation, national origin, age, and marital, veteran and handicap status. Sexual harassment, or harassment based on any of these other factors, is a form of employment discrimination which is in violation of law and has no place in AMO. It is AMO's policy that every employee has the right to work free of harassment, sexual or otherwise. It is the responsibility of all employees to make sure that there is full compliance with this policy.

Sexual Harassment Prohibited

The following conduct constitutes sexual harassment and will not be tolerated:

Any (a) unwelcome sexual advances, (b) requests for sexual favors, or (c) other verbal comments, gestures or physical actions of a sexual or otherwise offensive nature, whether solicited or unsolicited under any of the following circumstances:

1. Coercing an individual to submit to such conduct as a term or condition of employment.
2. Using an individual employee's submission to or rejection of such conduct as the basis for an employment-related decision.
3. Unreasonable interfering with an individual employee's work performance or creating an intimidating, hostile or offensive working environment, whether intentional or not. Offensive conduct covered by this last category would include, but not be limited to, deliberately provocative behavior, unwelcome sexual flirtations, advances or propositions, abusive language or gestures, overtures or statements of a sexual nature, unnecessary touching, graphic or verbal commentaries about an individual's body, sexually offensive or explicit jokes, a display in the workplace of sexually suggestive objects or pictures, suggestive or obscene letters, notes or invitations or the use of sexually degrading comments.

This policy applies equally to men and women, to same and opposite sex relationships, to supervisor-subordinate relationships, and to peer relationships.

Any employee who finds another person's behavior to be offensive and who is comfortable doing so may directly inform such other person that such conduct is offensive to such employee and that it must stop. In any event, employees are also encouraged to use the compliant procedure set forth below either initially or in the event the offending conduct does not stop.

Complaints

Any employee who believes that he or she has been discriminated against or harassed in violation of this policy by any supervisor, management official, other employee, or any other person in connection with employment with AMO should follow the procedures outlined below without fear of retaliation and, to the maximum extent possible, with an assurance of confidentiality and discretion consistent with our ability to conduct an internal investigation of the complaint.

If the complaint has merit, AMO will take corrective action. Violators of this policy will be subject to disciplinary action up to and including termination. In addition, violators may be required to participate in appropriate training or counseling.

Procedure

Should a complaint be raised by an employee, an effort will be made to resolve the matter promptly in the following manner:

Step 1

1. An employee who believes that he or she has been subject to any form of discrimination in employment, or harassment (sexual or otherwise) should report the incident immediately to the employee's supervisor. If that would prove uncomfortable, an employee may directly contact the officer in charge of the branch or office, or any other member of management. Should an employee notify his/her supervisor or any other member of management of an alleged violation of AMO policy, it shall be the supervisor's or manager's responsibility to notify the Executive Vice President who will, in turn, assist and/or arrange for an investigation of the complaint, including meeting with the parties and other appropriate persons. The question of whether a particular action or incident is prohibited requires a determination based on all the facts available in the matter. It is incumbent upon the person investigating the complaint to insure that the alleged incident and the investigatory process is appropriately documented (e.g., notes on all interviews, written statements, and checking various documents that may aid in the resolution of the complaint).

2. Upon completion of the investigation, a decision will be made regarding appropriate discipline, if any, for the responsible individual and, if appropriate, redress for the aggrieved employee.

3. Once a decision or decisions have been made in accordance with paragraph 2 above, they shall be communicated to the complainant and the accused.

Step 2

1. If any of the parties are dissatisfied with the decision at Step 1, that party may, within ten (10) working days of the Step 1 decision, submit the matter to the President of AMO. When the complaint reaches this step, the President of AMO shall be provided with a copy of the complete file.

2. When a dispute is filed with the President of AMO, it will be the responsibility of that individual to:

- (a) Consult with the Executive Vice President
- (b) Investigate the complaint
- (c) Meet with the parties to the dispute; and
- (d) In consultation with appropriate management personnel, reach and communicate to the parties an independent conclusion within thirty (30) days of receipt of the complaint at Step 2.

Confidentiality

All information, records and data assembled in connection with the investigation of a complaint shall be kept strictly confidential, except as necessary to conduct the investigation, and will be kept separate and apart from the individual(s) personnel file(s). Such records of complaint shall be retained by the Executive Vice President. However, any record of disciplinary action resulting from a complaint of discrimination/harassment shall be included in the personnel file(s) of the disciplined employee(s).

In addition, in order to minimize needless rumors and other adverse consequences, any employee bringing a complaint or assisting in the investigation of a complaint should use his or her best efforts to keep the complaint and investigation process strictly confidential, except to the extent necessary to pursue the complaint.

Any employee bringing a complaint or assisting in the investigation of a complaint will not be adversely affected in terms and conditions of employment, nor discriminated against or discharged because of the complaint.