

Program Non-Discrimination and Anti-Harassment Policy and Procedures

This policy applies to applicants to and participants in any of New Leaders' programs (collectively, "Programs") and to New Leaders employees.

Non-Discrimination and Harassment

It is the policy of New Leaders to provide a workplace and Programs free of discrimination based on race, color, age, sex, sexual orientation, gender identity, national origin, ancestry, religion, handicap, disability, or any other protected characteristic. Various laws prohibit discrimination, as well as retaliation against individuals for opposing unlawful discrimination, in the administration and operation of the Programs, including employment or treatment therein, or admission or access thereto. New Leaders does not discriminate in administration and operation of its Programs and activities, including admission or access to treatment or employment, and discrimination and retaliation are prohibited. In particular, New Leaders is required by Title IX and its implementing regulations at 34 C.F.R. Part 106 not to discriminate on the basis of sex in the educational programs and activities that it operates, and it does not discriminate on the basis of handicap in violation of Section 504 of the Rehabilitation Act and its implementing regulations at 34 C.F.R. Part 104. Program participants and New Leaders employees are also prohibited from intimidating, threatening, coercing, discriminating against or otherwise retaliating against any employee or Program participant who refuses or objects to discrimination, who reports any discrimination, or who cooperates in New Leaders' investigation of a complaint of discrimination or for the purpose of interfering with any nondiscrimination right or privilege of a Program participant.

It is also the policy of New Leaders to provide a workplace and Programs free of harassment based on race, color, age, sex, sexual orientation, gender identity, national origin, ancestry, religion, handicap, disability, or any other protected characteristic. Various laws prohibit harassment, as well as retaliation against individuals for opposing unlawful harassment, in the administration and operation of the Programs. Harassment and retaliation are prohibited. Specifically, Program participants and New Leaders employees are prohibited from making unwelcome sexual advances or requests for sexual favors and from participating in verbal or physical conduct of a sexual nature – such as jokes, innuendo, or display or dissemination of sexually explicit materials -- which may interfere with an individual's work performance or a Program participant's experience. Program participants and New Leaders employees are also prohibited from intimidating, threatening, coercing, discriminating against or otherwise retaliating against any employee or Program participant who refuses or objects to unwelcome verbal or physical conduct of a sexual nature, who reports any of the above conduct, or who cooperates in New Leaders' investigation of a complaint of harassment or for the purpose of interfering with any nondiscrimination right or privilege of a Program participant.

Complaint Procedures

Any Program participant or New Leaders staff member who has a complaint or concern about discrimination or harassment prohibited by this policy should report it immediately to his or her New Leaders Program Director or Advisor, Regional Executive Director of Program, Program Executive Director, the Lead Executive Director of Programs, or the Chief Program Officer, or to New Leaders' General Counsel, who has been designated by New Leaders to coordinate its efforts to comply with and

carry out its responsibilities under all nondiscrimination laws and regulations, including but not limited to Title IX and its implementing regulations (“Title IX Coordinator”¹). If any New Leaders staff member becomes aware of possible discrimination or harassment in violation of this policy, he or she must immediately advise the General Counsel. Complaints may be submitted anonymously to the General Counsel.

Complaints or concerns should be submitted promptly, and within five (5) business days of the alleged offense, for assistance in clarifying such issues, planning an appropriate response, investigation and/or action, and avoiding an unwanted behavior becoming severe and disruptive to the work environment. Complaints or concerns should be submitted without regard to whether a witness was present.

After receiving a report of potential discrimination, harassment, or retaliation, the General Counsel will:

- Receive complaints, questions or concerns directly regarding discrimination, harassment, or retaliation,
- Conduct a complete, prompt, and equitable investigation of any issues,
- Facilitate solutions and related actions for specific situations,
- Communicate with all individuals involved regarding the investigation and related actions,
- Partner with appropriate resources, including the organization’s Chief Program Officer, and
- Document reports and steps taken to resolve them

No action will be taken against anyone who complains of discrimination or harassment, via either this policy or an external procedure, unless such an accusation is shown to be intentionally false.

To the extent possible, the confidentiality of any individual who raises a complaint or concern about conduct in violation of this policy, as well as that of any witnesses and the alleged action, will be protected against unnecessary disclosure, subject to compliance with any relevant laws.

Violations

Violation of this policy may lead to disciplinary action, up to and including dismissal from the Program, for Program participants, or termination of employment, for New Leaders staff members.

New Leaders will not tolerate discrimination, harassment, intimidation, or retaliation in any form.

Participants may direct any questions about this policy to their program team. Participants and employees may direct any questions about this policy to the Title IX Coordinator as follows:

Laura Kadetsky, General Counsel

lkadetsky@newleaders.org

202.315.2037

1003 K Street NW, Suite 500

Washington, DC 20001

¹ The Title IX Coordinator is required by 34 C.F.R. Part 106 to receive, investigate, and resolve complaints of sexual harassment and discrimination based on sex.