




California ISO
Shaping a Renewed Future

Harassment Prevention Policy

 California ISO Shaping a Renewed Future	Human Resources	Adopted	10/23/1997
		Version No.	1.4
		Revision Date	1/9/2012
HARASSMENT PREVENTION POLICY		Distribution Restriction: ISO PUBLIC	

REVISION HISTORY

VERSION NO.	DATE	DESCRIPTION
1.0	10/23/1997	Final
1.1	5/1/2003	Minor clarifying edits
1.2	5/2/2006	Minor clarifying edits
1.3	3/3/2011	Minor clarifying edits; update on how to report concerns
1.4	1/9/2012	Addition of gender expression and genetic characteristic as a protected class



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Harassment and Discrimination Policy

The ISO is committed to providing a work environment that is free of discrimination and unlawful or unacceptable harassment.

Company policy prohibits sexual harassment and discrimination based on race, color, creed, religion, gender, gender identity and expression, sexual orientation, genetic characteristic, national origin, ancestry, age, physical or mental characteristic or disability, medical condition (including pregnancy, childbirth, or related medical conditions), veteran status, marital status, citizenship status, or on any other basis protected by federal, state or local law, ordinance, or regulation.


All such harassment, whether in violation of applicable laws or not, is unacceptable at the ISO and will not be tolerated.

The ISO's anti-harassment policy applies to all persons involved in the operation of the ISO. It prohibits unlawful or unacceptable harassment by any employee of the ISO, including managers, supervisors or co-workers.

Additionally, the ISO will not tolerate any form of harassment on the part of customers, vendors, suppliers, consultants, contractors, temporary employees or other individuals engaged in business activities with ISO employees. All ISO employees are responsible for helping prevent harassment in the workplace.

Prohibited harassment may include, but is not limited to, the following types of behavior:

- Verbal conduct such as epithets, derogatory, pejorative, supremacist or sexually-oriented jokes, comments or slurs, and unwanted sexual advances, invitations or comments.
- Posting or distribution of derogatory, pejorative, hateful, supremacist, or sexually-oriented materials, photography, cartoons, drawings or gestures.
- Physical conduct such as assault, unwanted touching, blocking normal movement, leering or staring inappropriately, or interfering with work because of gender, race or any other protected basis.

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- Insulting, intimidating or sexually suggestive comments about an individual’s dress or body.
- Insulting, intimidating or sexually suggestive written, recorded, or electronically transmitted messages.
- Threats or demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss, or offers of employment benefits in return for sexual favors.
- Retaliation for having reported or threatened to report harassment.

While state, federal and local laws provide further guidance on what behavior constitutes unlawful harassment, employees should be advised that the ISO takes all such behavior seriously, whether or not the behavior constitutes unlawful activity. Remember – all unlawful activity violates this policy, but not all violations of this policy require unlawful activity.


As an example, a manager publicly berating an employee, but not basing that activity on gender or any other protected class status, may not violate the law – but will be considered to be in violation of this policy, and subject to disciplinary action.

Sexual Harassment Policy

Sexual harassment deserves special attention. Unwelcome sexual advances, requests for sexual favors, and other physical, verbal or visual conduct of a sexual nature constitute sexual harassment when (1) submission to the conduct is an explicit or implicit term or condition of employment; (2) submission to or rejection of the conduct is used as the basis for an employment decision; or (3) the conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment is conduct based on sex or gender, whether directed toward a person of the opposite or same sex, and may include any of the following:

- Explicit sexual propositions
- Sexual innuendo
- Suggestive comments

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- Sexually oriented kidding, teasing or practical jokes
- Jokes involving obscene printed or visual material
- Any unwelcome physical contact, such as patting, pinching or brushing against another person’s body

The ISO will not tolerate any form of sexual harassment, including both opposite and same-sex harassment. If you harass, expect to be confronted and subjected to discipline. You could lose your job.

If you are harassed or witness harassment, you should report the incident as described below – and anyone in a management or supervisory role is required to do so.

This policy applies not only to activities in the workplace during normal working hours, but also to all work-related social functions, whether on or off ISO premises. It also applies to business-related travel and any other situation when one employee can exert power or authority over another employee.


Remember, your actions outside the premises may negatively impact an employee’s ability to perform his or her job functions within the workplace. Any ISO employee engaged in such “out of the office” actions will be subject to disciplinary action. Employees are prohibited *at all times* from engaging in any behavior that may be perceived as harassment.

What should I do if I believe I have been harassed?

If any employee thinks he or she is being harassed on the job because of gender, race, or other protected basis, or if an employee observes behavior he or she believes to be in violation of this policy, the employee should immediately report the matter in writing (preferred) or verbally to his or her manager.

Additionally, you may report your concerns to:

- Vice President of Human Resources, or other member of management in Human Resources
- Assistant General Counsel – Corporate

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If you are not comfortable reporting your concerns directly, the employee Hotline is available 24x7. Concerns may be reported via phone at (866) 384-4277, via [Code of Conduct Reporting](#) on eCurrent, or at www.ethicspoint.com.

All reports to the hotline can be made anonymously and the reporting employee can track resolution of the issue using a tracking number.

Your report should include details of the incident or incidents, names of the individuals involved and names of any witnesses.


Managers must refer all harassment complaints, or all suspected harassment complaints, to the Vice President of Human Resources, who will ensure the matter is handled in a timely and appropriate manner. The ISO will undertake a prompt, thorough and objective investigation of all harassment allegations.

The ISO will take every effort to handle the investigations in a discreet and confidential manner, but cannot guarantee complete confidentiality if disclosure of the identity of the complainant is required to effectively complete an investigation. All employees involved as a witness in such an investigation, however, will be advised that they are not to discuss the matter with any other ISO employee or any other person.

When possible, we recommend (but do not require) that you confront the harasser and tell the person that you find his/her conduct offensive and you want it to stop. The harasser may not realize the behaviors are offensive. Sometimes a direct confrontation will end the situation.

The ISO will not retaliate against you for filing a complaint, assisting in making a harassment complaint, or cooperating in a harassment investigation, and will not tolerate or permit retaliation by management, employees or co-workers, or by anyone associated with the ISO.

However, appropriate consultation and disciplinary action may be taken if a claim of discrimination or harassment is found to be malicious and/or untruthful, or if any employee – whether a complainant, or an accused individual, or a witness – is untruthful in any investigation undertaken by the ISO, or violates the witness confidentiality obligations described in this policy.

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What happens if harassment has occurred?

If the ISO determines that unlawful harassment or activities in violation of ISO policy have occurred, remedial action will be taken in accordance with the circumstances involved. Any employee determined by the ISO to be responsible for harassment will be subject to appropriate disciplinary action, up to and including immediate termination of employment.

If you file a complaint of harassment, you will be informed of the results of the investigation, although privacy concerns may prohibit the company from advising you of specific disciplinary actions imposed against another employee.

What government agencies investigate claims of harassment?

We encourage you to report any incident of harassment that violates this policy immediately to the ISO, so that the issue can be quickly and fairly resolved.

You also should be aware that the Federal Equal Employment Opportunity Commission (EEOC) and the California Department of Fair Employment and Housing (FEHA) investigate and prosecute complaints of prohibited harassment in employment.

If you think you have been harassed or that you have been retaliated against for resisting or complaining, you may file a complaint with the appropriate agency. Website addresses for these agencies are www.eeoc.gov and www.dfeh.ca.gov.