



Sexual Harassment Policy

Purpose

American Technology Consulting LLC ("ATC" or "Company") is committed to providing a work environment that is free from sexual harassment and discrimination. The purpose of this policy is to define sexual harassment, establish procedures for addressing complaints, and affirm the Company's commitment to preventing and addressing sexual harassment in the workplace.

Scope

This policy applies to all employees, contractors, interns, vendors, clients, and any other individuals conducting business with or on behalf of ATC. It covers behavior that occurs in the workplace, during work-related activities, and in any context that may affect the work environment.

Definition of Sexual Harassment

Sexual harassment is any unwelcome sexual advance, request for sexual favors, or other verbal, non-verbal, or physical conduct of a sexual nature when:

1. **Submission to such conduct** is made either explicitly or implicitly a term or condition of an individual's employment.
2. **Submission to or rejection of such conduct** is used as the basis for employment decisions affecting the individual.
3. **The conduct unreasonably interferes with an individual's work performance** or creates an intimidating, hostile, or offensive work environment.

Examples of sexual harassment include but are not limited to:

- Unwelcome touching or physical contact.
- Inappropriate or offensive jokes, comments, or gestures.
- Display of sexually explicit materials.
- Repeated, unwelcome invitations or propositions.
- Derogatory remarks about someone's gender, sexuality, or appearance.
- Retaliation against someone for filing a complaint or participating in an investigation.



Responsibilities

- **Management:** Supervisors and managers are responsible for modeling appropriate behavior, taking immediate action to address concerns, and ensuring that all complaints are handled appropriately and confidentially.
 - **Employees:** All employees are expected to maintain a respectful workplace and report incidents of sexual harassment.
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Reporting Sexual Harassment

1. How to Report:

- Employees who experience or witness sexual harassment should report the incident promptly to their supervisor, the Human Resources Department, or to our designated Compliance Officer.
- Reports may be made verbally or in writing. Written reports should include as much detail as possible, such as dates, times, locations, witnesses, and a description of the behavior.

2. Confidentiality:

- All reports will be handled with the utmost discretion. Information will only be shared with those who need to know to investigate and resolve the complaint.

3. No Retaliation:

- Retaliation against individuals who report sexual harassment or participate in an investigation is strictly prohibited. Any act of retaliation should be reported immediately and will result in disciplinary action.
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Investigation Procedure

1. Initial Review:

- Upon receiving a complaint, HR or the designated Compliance Officer will review the report to determine the appropriate course of action.

2. Investigation:

- A prompt, thorough, and impartial investigation will be conducted. This may include interviews with the complainant, the alleged harasser, and any witnesses.



3. Findings and Actions:

- Based on the investigation, appropriate corrective actions will be taken, which may include disciplinary measures up to and including termination.
- Both the complainant and the alleged harasser will be informed of the outcome of the investigation, to the extent permissible by law.

Training and Prevention

- All employees will undergo mandatory training on sexual harassment prevention during onboarding and at regular intervals.
- Managers will receive additional training on recognizing and addressing inappropriate behavior and fostering a culture of respect.

Policy Enforcement

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment. The Company reserves the right to modify this policy as needed to maintain compliance with applicable laws and promote a safe work environment.

Acknowledgment

By signing below, I acknowledge that I have read, understood, and agree to comply with the Sexual Harassment Policy of American Technology Consulting LLC.

Employee Name: _____

Signature: _____

Date: _____