

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Andrea Bubel	DATE SUBMITTED: 10/14/2026	SECTION: Human Resources	
BOARD APPROVED ON: xx/xx/xx	DATE REVISED: 10/14/2026	SUBJECT: Harassment and Sexual Harassment	
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 10/14/2026		POLICY #: ED-035	PAGE #: 1 of 6

I. APPLICATION

This policy applies to all employees, applicants for employment, paid and unpaid interns, former employees, contractors, and other persons conducting business with Blue Water Developmental Housing, Inc. (BWDH), regardless of immigration status. In this policy, the term “employees” refers collectively to these individuals. All covered individuals must follow this policy. BWDH will provide it upon hiring or implementation and post it on the company website, in the main office, and, when possible, at other locations where BWDH does business.

II. POLICY

BWDH is committed to a workplace free from sexual and other forms of harassment. Harassment is prohibited and may constitute unlawful workplace discrimination. All employees are expected to conduct themselves in a manner that prevents harassment. Sexual or other harassment will not be tolerated.

This policy prohibits harassment based on sex or membership in a protected class. Protected classes under applicable Michigan law and/or BWDH policy include religion, race, color, national origin, age, sex, height, weight, marital status, disability, sexual orientation, and gender identity. A protected class is a category of people who share a characteristic protected from discrimination or harassment. A person may not be harassed, treated unfairly, or subjected to an adverse employment action because the person has or is perceived to have a protected characteristic.

Harassment may be addressed under this policy even when conduct involves a single incident. Employees may report harassment internally and may also seek relief through applicable government agencies or courts.

Retaliation Prohibition

BWDH prohibits retaliation against anyone who, in good faith, reports suspected harassment, provides information, supports another person’s complaint, encourages a report, testifies, or otherwise assists with an investigation or proceeding. Retaliation may occur inside or outside the workplace and need not be job-related. Anyone who engages in retaliation is subject to disciplinary action, up to and including termination.

An individual remains protected when acting on a good-faith belief that conduct is unlawful, even if the conduct is ultimately not found to violate the law. Intentionally false allegations made to harm or distress another person are prohibited and may result in disciplinary action.

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Andrea Bubel	DATE SUBMITTED: 10/14/2026	SECTION: Human Resources	
BOARD APPROVED ON: xx/xx/xx	DATE REVISED: 10/14/2026	SUBJECT: Harassment and Sexual Harassment	
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 10/14/2026		POLICY #: ED-035	PAGE #: 2 of 6

What Is Sexual Harassment?

Sexual harassment is a form of sex discrimination and includes harassment based on sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity, or transgender status. It includes unwelcome conduct of a sexual nature or conduct directed at an individual because of sex when it:

- Unreasonably interferes with work performance or creates an intimidating, hostile, or offensive work environment, even if the reporting individual is not the intended target.
- Is made explicitly or implicitly a term or condition of employment.
- Uses submission to or rejection of the conduct as a basis for employment decisions.

Hostile Environment Harassment includes words, signs, jokes, pranks, intimidation, physical violence, unwanted verbal or physical advances, sexually explicit derogatory statements, or sexually discriminatory remarks that are reasonably offensive or objectionable, cause discomfort or humiliation, or interfere with job performance.

Quid Pro Quo Harassment occurs when a person in authority attempts to trade employment benefits or privileges—such as hiring, promotion, continued employment, or other terms or conditions of employment—for sexual favors or tolerance of overtly sexual behavior.

Examples of Sexual Harassment

The following are examples of conduct that may constitute unlawful sexual harassment and are strictly prohibited:

- Unwanted sexual advances or propositions, sexually oriented gestures, noises, remarks, jokes, or comments about sexuality or sexual experience.
- Sex stereotyping based on expectations about how individuals of a particular sex should act or look.
- Unwanted touching, pinching, patting, kissing, hugging, grabbing, brushing against, or poking another employee's body.
- Rape, sexual battery, molestation, or attempts to commit such assaults.
- Requests or pressure for sexual favors or unwelcome sexual activity, including threats or implications concerning job performance, promotion, or other employment benefits or detriments.

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Andrea Bubel	DATE SUBMITTED: 10/14/2026	SECTION: Human Resources	
BOARD APPROVED ON: xx/xx/xx	DATE REVISED: 10/14/2026	SUBJECT: Harassment and Sexual Harassment	
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 10/14/2026		POLICY #: ED-035	PAGE #: 3 of 6

- Displaying or sharing sexually demeaning or pornographic pictures, posters, calendars, graffiti, objects, promotional or reading materials, including on workplace computers or cell phones.

What Is Other Harassment?

Harassment is not limited to sexual harassment. Unwelcome conduct directed at an individual because of membership in a protected class may violate this policy when it unreasonably interferes with work performance or creates an intimidating, hostile, or offensive work environment. This includes words, signs, jokes, pranks, intimidation, physical violence, derogatory statements, or discriminatory remarks that are reasonably offensive, cause discomfort or humiliation, or interfere with job performance.

- Hitting, tripping, assaults, batteries, or other physical acts.
- Gestures, noises, remarks, jokes, or comments about a protected characteristic, including offensive or derogatory language.
- Displaying or sharing materials, symbols, images, or publications that demean or call for action against members of a protected class, including on workplace computers or cell phones.
- Interfering with, destroying, or damaging a person's workstation, tools, equipment, or ability to perform the job.
- Sabotaging an individual's work, bullying, yelling, or name-calling.
- Exclusion.

Who and Where Does This Policy Apply?

Harassment can occur between any individuals and may involve a supervisor, subordinate, coworker, agent of the employer, contractor, vendor, client, customer, or other non-employee. The target may be the person directly subjected to the conduct or another person affected by it.

Harassment is not limited to the physical workplace. It may occur during business travel or employer-sponsored events and through calls, texts, emails, or social media, including on personal devices or during non-work hours, when a person covered by or subject to this policy is involved.

Examples of Harassment

Examples described in the original policy include a Muslim employee subjected to religious hostility and unequal treatment; an African-American school district employee

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Andrea Bubel	DATE SUBMITTED: 10/14/2026	SECTION: Human Resources	
BOARD APPROVED ON: xx/xx/xx	DATE REVISED: 10/14/2026	SUBJECT: Harassment and Sexual Harassment	
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 10/14/2026		POLICY #: ED-035	PAGE #: 4 of 6

exposed to a Confederate uniform known to be offensive to the employee; and a worker over age 50 subjected to repeated age-related comments, retirement remarks, and statements questioning the employee's ability to work. These examples illustrate that harassment may involve discriminatory treatment, offensive displays, or repeated comments based on a protected characteristic.

Reporting Harassment

Preventing harassment is everyone's responsibility. BWDH cannot prevent or remedy harassment unless it knows about it. Anyone covered by this policy who experiences, witnesses, or becomes aware of potential harassment should report it to a supervisor, manager, or the Executive Director or his/her designate.

Reports may be made verbally or in writing. The Harassment Reporting Form is preferred. A person reporting on behalf of another employee should identify that on the form. If a complaint involves someone in the employee's direct chain of command, the employee may report to another program supervisor, Division Director, or anyone in management. Verbal reports will also be accepted.

All employees are required to report harassment or behavior that violates this policy. Supervisors and managers who receive a complaint, observe potentially harassing behavior, or otherwise become aware of suspected harassment must promptly report it to the Executive Director or his/her designate. Failure to report or knowingly allowing harassment to continue may result in discipline.

Complaint and Investigation

All complaints or information about suspected harassment will be investigated, whether reported verbally or in writing. Investigations will be prompt, thorough, fair, and impartial, with due process for complainants, witnesses, and alleged harassers. Information will be kept confidential to the extent possible, and employees may be required to cooperate.

Upon receiving a complaint, the Division Director or his/her designate will notify the Executive Director or his/her designate, immediately review the allegations, and take appropriate interim action when needed. For verbal complaints, the Division Director or designate should encourage completion of the Harassment Reporting Form; if the individual declines, the Division Director or designate may prepare the form and, when possible, ask the reporting individual to verify it.

The Division Director or designate will preserve relevant documents, emails, phone records, and electronic communications; interview the parties and relevant witnesses;

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Andrea Bubel	DATE SUBMITTED: 10/14/2026	SECTION: Human Resources	
BOARD APPROVED ON: xx/xx/xx	DATE REVISED: 10/14/2026	SUBJECT: Harassment and Sexual Harassment	
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 10/14/2026		POLICY #: ED-035	PAGE #: 5 of 6

maintain confidentiality; and prepare written investigation documentation. No documents related to the investigation may be destroyed.

The investigation documentation must include:

- A list and detailed summary of documents reviewed.
- A list of individuals interviewed and detailed summaries of their statements.
- A timeline of events.
- A summary of prior relevant incidents, whether reported or unreported.
- The basis for the decision, final resolution, and any corrective action.

Investigation materials and associated documents must be provided to the Executive Director or his/her designate and maintained in a secure, confidential file separate from the employee's personnel file.

The Executive Director or his/her designate will promptly notify the reporting individual and the individual(s) about whom the complaint was made of the final determination, implement corrective actions, and advise the reporting individual of the right to appeal and the right to pursue available external remedies. Retaliation against anyone involved in a complaint or investigation is prohibited.

III. NOTIFICATION/PROCEDURE

WHO

DOES WHAT

Employee

1. Make a formal written complaint to their program supervisor using the Harassment Reporting Form (preferred), or make a verbal complaint. If the complaint involves an individual in the employee's direct chain of command, the employee may go to another program supervisor and/or division director, or anyone in a management position with the complaint.

Division Director

2. Investigates allegations of sexual or other forms of harassment immediately and thoroughly.

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Andrea Bubel	DATE SUBMITTED: 10/14/2026	SECTION: Human Resources	
BOARD APPROVED ON: xx/xx/xx	DATE REVISED: 10/14/2026	SUBJECT: Harassment and Sexual Harassment	
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 10/14/2026		POLICY #: ED-035	PAGE #: 6 of 6

- | | |
|-------------------------|--|
| | 3. Contacts the human resources manager and the executive director for guidance and assistance. |
| Human Resources Manager | 4. Promptly submits a written report of the complaint investigation to the executive director. |
| | 5. Assures that the investigation is handled in a fair, timely and appropriate manner. |
| | 6. Subjects any employee engaging in improper harassing behavior to disciplinary action, including possible termination of employment. |

III. NOTIFICATION/PROCEDURE (continued)

- | WHO | DOES WHAT |
|-------------------------|---|
| Human Resources Manager | 7. Handles all information gathered in the investigation of each allegation in a confidential manner. Ensures that the materials gathered in the course of the investigation are kept in a confidential file. |
| | 8. Advises the employee/complainant of the disposition of the claim and the right to appeal. |
| Employee | 9. If appealing, must submit an appeal in writing to the executive director within a reasonable period of time after receipt of the disposition of claim. |
| Executive Director | 10. Receives and reviews appeal. Must respond in writing in a timely manner. |