

**POLICY MANUAL**  
**HUMAN RESOURCES POLICIES**  
**WORKPLACE HARASSMENT POLICY**

**PURPOSE**

To explain to employees of the Mississippi Lottery Corporation (“MLC”) what the MLC will consider to be workplace harassment deserving of disciplinary action.

**SCOPE**

This policy applies to all employees (full-time and part-time), including MLC officers. It supplements the MLC’s policy statement regarding Non-Discrimination and Reasonable Accommodation.

**RESPONSIBILITIES**

The President shall provide overall support of the Workplace Harassment Policy.

**Vice President of Human Resources:** The Vice President of Human Resources shall be responsible for receiving and investigating all workplace harassment complaints filed. He/She shall assist all levels of management in the interpretation and application of this policy. He/She will also assure that supervisors are trained with respect to this policy.

**Senior Staff:** The department vice presidents shall ensure that all employees are aware of the MLC’s Workplace Harassment policy.

**DEFINITIONS**

“Workplace Harassment” is unwelcome verbal, written or physical conduct that either denigrates or shows hostility or aversion towards a person on the basis of race, color, national origin, age, sex or sexual orientation, religion, disability, marital status or political affiliation.

“Sexual Harassment” might not involve hostility or gender bias. Unwelcome sexual advances, requests of a sexual nature and similar conduct constitute sex harassment when -

- A. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; or,
- B. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or,
- C. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. It is important to remember that "offensive environment" sexual harassment is behavior that is perceived as offensive by the complaining employee(s). Some examples of this type of sexual harassment are:

- Whistling or catcalling;
- Touching, pinching or patting;
- Unwelcome hugging or patting;
- Vulgar or obscene jokes;
- Jokes or comments that belittle women or men;
- Crude or vulgar language;
- Commenting on clothing of an individual in a sexual way, e.g. "Boy, I sure like the way those pants fit";
- Referring to someone in demeaning terms, e.g. "girl", "honey", "hunk";
- Displaying crude jokes and pictures including pin-ups from magazines such as Playgirl or Playboy or sexually suggestive calendars;
- Repeatedly asking someone for a date after you have been turned down;
- Written examples: suggestive or obscene letters, notes and emails.

“Retaliation” – Any adverse employment action taken against an employee because he or she reported or refused to participate in Workplace Harassment.

“Employee” - Any individual employed by the MLC.

“Non-Employee” - any retailer, contractor or vendor associated with the MLC.

“Directors” – members of the MLC’s Board of Directors.

“Contractors” – all Vendors and Retailers.

- A. MLC employees must maintain a high standard of honesty, integrity, impartiality and conduct in order to ensure the proper performance of MLC business and to maintain the confidence of the public. The MLC has zero tolerance for Workplace Harassment and Sexual Harassment. The harasser’s rank will not matter. Nor will the MLC knowingly permit anyone in a supervisory role to seek to have, or to have, a sexual relationship with a subordinate, even if consensual.
- B. The Human Resources department will provide ongoing training and education of its employees relative to practicing proper work conduct. All MLC employees have an obligation to take appropriate actions to prevent workplace harassment from interfering with the operations of the MLC. If made aware, the MLC also will intervene to protect MLC employees (to the extent reasonably possible) from Workplace Harassment or Sexual Harassment by MLC Contractors.
- C. Any violations of this policy should be reported to the Vice President of Human Resources. He/She shall be responsible for investigating and recommending appropriate action to the President of the MLC. If Vice President of Human Resources should be accused, the President will designate an alternate to conduct the investigation and make the report. If the President should be accused, the Chairman of the Human Resources Committee of the Board of Directors or his/her designee shall designate an alternate to conduct the investigation and make the report to the HR Committee Chairman.