

RECEIPT AND ACKNOWLEDGMENT

I hereby acknowledge receipt of the Sexual and Other Unlawful Harassment Policy of Clear Point Consultants, Inc. I acknowledge that said policy has been provided to me for educational and guidance purposes only, and is in no manner to be deemed to constitute an express or implied contract between the Company and me. I further acknowledge that the Company reserves the right to amend said policy at any time and from time to time.

I, also hereby acknowledge receipt of Clear Point Consultants Best Practices for Contractors.

Print Name

Signature

Date

CLEAR POINT CONSULTANTS, INC.

SEXUAL AND OTHER UNLAWFUL HARASSMENT POLICY

Clear Point Consultants, Inc. (the “Company”) is committed to providing a work environment that is free of discrimination and unlawful harassment. Actions, words, jokes, or comments based on an individual’s sex, race, ethnicity, age, sexual orientation, religion, or any other legally protected characteristic will not be tolerated. Sexual and other harassment in the workplace (both overt and subtle) is unlawful, and is a form of employee misconduct that is demeaning to another person, undermines the integrity of the employment relationship, and is strictly prohibited.

Sexual harassment is often difficult to identify or define. The following discussion is for guidance purposes only and is not intended as the sole definition of the term. Sexual harassment is a form of sex discrimination that is illegal under both Title VII of the Civil Rights Act of 1964 and Massachusetts General Laws. c. 151B §4(16A). These laws provide that unwelcome sexual advances, requests for sexual favors, and other physical or verbal conduct of a sexual nature constitute sexual harassment when:

- submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of an individual’s employment or a basis for employment decisions affecting the individual; or
- such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, humiliating or sexually offensive work environment.

The following are examples of conduct which may be considered sexual harassment:

- repeated, offensive sexual flirtations, advances or propositions;
- continued or repeated verbal abuse or innuendoes of a sexual nature;
- uninvited physical contact—touching, kissing, hugging, etc.;
- verbal comments of a sexual nature about an individual;
- display of sexually suggestive objects or pictures;
- jokes or remarks of a sexual nature in front of people who find them offensive;
- obscene gestures or suggestive or insulting sounds; and
- indecent exposure

Incidents of sexual harassment may result from the conduct of managers, supervisors, or other employees, and may also result from the conduct of the Company’s clients, vendors, or suppliers or other parties with whom the Company deals with on a regular

basis. All incidents of harassment, whether occurring internally at the Company's offices or externally when any employee of the Company is performing services at any other location, including the offices of any client, vendor, or supplier, should be reported promptly to the contact persons identified in the complaint procedure outlined below.

SEXUAL HARASSMENT COMPLAINT PROCEDURE

A. The Procedure

In compliance with Massachusetts General Laws Chapter 151B, Section 3A, the following sexual harassment complaint procedure has been developed by the Company specifically to ensure that complaints are investigated quickly and in a manner that is fair to all:

1. Any employee having a complaint of harassment should immediately notify his/her immediate supervisor. If this complaint is against the immediate supervisor or if the employee does not feel comfortable in approaching his/her immediate supervisor relative to the complaint, the employee should immediately notify one of the following individuals:

Name: Carol Szatkowski, President
Address: Clear Point Consultants, Inc.
11 Beach St.
Manchester, Ma 01944
Telephone: (978) 526-1996, ext. 1

Or

Name: Jean Cronin, Accountant
Address: Clear Point Consultants, Inc.
11Beach St.
Manchester, Ma 01944
Telephone: (978) 526-1996 ext. 3

2. Any Supervisor or member of management receiving a complaint, or who becomes aware of possible sexual or other harassment, must report the situation to the following individual:

Name: Carol Szatkowski, President
Address: Clear Point Consultants, Inc.
11 Beach St.
Manchester, Ma 01944
Telephone (978) 526-1996

3. The Company or its designated representative will promptly conduct a confidential investigation of any complaint, protecting the identity of the complaining party, witnesses, and the individual alleged to have violated the policy, to the extent possible.

4. Because of the private nature of many harassment incidents and the emotional complexities surrounding such issues, every effort will be made to resolve the problems on an informal basis.

5. Appropriate disciplinary action will be taken against an offending individual if a violation of this policy is found to have occurred. The range of consequences for an individual whom the Company determines violated this policy or committed unlawful harassment may include reprimand, demotion, transfer, suspension without pay and/or immediate termination of employment. In the event that the Company determines that harassment has occurred as a result of the actions of a third party not in the employ of the Company, the Company will take appropriate action, to the extent practical, to cause such third party to cease and desist any such activities, may take efforts to insulate an employee from any contact with such third party and may take other appropriate action which the Company deems warranted under the circumstances.

6. In the event of an investigation, each employee, supervisor and manager is responsible for cooperating in any investigation if requested to do so by the person conducting the investigation.

B. Confidentiality

All actions taken to investigate and resolve complaints through this procedure shall be conducted with as much confidentiality as possible without compromising the thoroughness of the investigation. The sexual harassment investigator will not discuss the complaint or the investigation with anyone who is not directly involved in the investigation.

C. No Retaliation for Filing Complaint of Sexual Harassment or for Cooperating in an Investigation

No employee, supervisor or manager shall be retaliated or discriminated against in any way for making a complaint of sexual harassment in good faith or for assisting or cooperating in the investigation of such a complaint. Such retaliation or discrimination is unlawful, and shall not be tolerated by the Company.

D. State or Federal Agencies

In the event that any employee is not satisfied with the actions of the Company taken with respect to any matter, or if an employee desires to obtain any information regarding their legal rights with respect to such matters, an employee may contact the following federal or state enforcement agencies.

Federal: Equal Employment Opportunity Commission (“EEOC”)
One Congress Street
Room 1001
Boston, MA 02114
(617) 565-3200
Fax (617) 565-3196

State: Massachusetts Commission Against Discrimination
 (“MCAD”)
One Ashburton Place
6th Floor
Boston, MA 02108
(617) 727-3990
Fax (617) 720-6053

E. General Inquiries

If any employee has any questions or concerns regarding any aspect of this policy, the employee should promptly contact Carol Szatkowski at the location provided above. If any of the individuals identified as contact persons in this policy are not in the employ of the Company, any notifications, communications or complaints should be directed to their successor, or, if no successor has been designated by the Company, such notifications, communications, or complaints should be directed to the Company’s President.