



**35 NEW ENGLAND BUSINESS CTR.
ANDOVER MA 01810**

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Harassment Policy

JVT Advisors strives to provide a work environment free of discrimination, intimidation, and insult. JVT Advisors therefore prohibits harassment on the basis of race, color, sex, age, marital status, sexual orientation, religion, national origin, disability, or status as a qualified special disabled veteran, veteran of the Vietnam Era, recently separated veteran, and other U.S. veteran who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized, or any other legally protected status or characteristic. Behavior prohibited by this policy includes any conduct that creates an intimidating, hostile, or offensive working environment. Harassment can take many forms. JVT Advisors commitment to a harassment-free work environment bars not only harassment by employees but also harassment by third parties with whom JVT Advisors employees interact, such as customers, independent contractors or vendors. JVT Advisors will terminate its relationships with independent contractors who harass JVT Advisors' employees or JVT Advisors' clients.

Sexual harassment also is illegal and contrary to JVT Advisors' policy. JVT Advisors prohibits any employee or independent contractor from making unwelcome and unsolicited sexual advances or requests for sexual favors, or engaging in other verbal or physical conduct of a sexual nature when any such conduct or other gender-based behavior creates an intimidating, hostile, or offensive working environment.

Examples of conduct prohibited by JVT Advisors include, but are not limited to:

- Pressuring an employee to submit to sexual demands as a condition of continued employment, or promising job benefits in return for sexual favors.
- Unwelcome physical touching of a JVT Advisors' employee.
- Accessing pornographic Internet sites while at work.
- Engaging in derogatory stereotypes about members of a particular gender.
- Displaying sexually explicit materials in the workplace.
- Discussing one's sexual activities or inquiring into those of another in the workplace.
- Circulating demeaning or degrading jokes or cartoons via JVT Advisors' e-mail system or their clients.
- Leering or whistling, or making suggestive or insulting gestures or comments in the workplace.

Employees shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

- Filing a complaint;
- Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of section 503 of the Rehabilitation Act of 1973, as amended (“Section 503”), or the Vietnam Era Veterans’ Readjustment Act of 1974, as amended (“VEVRAA”), or any other Federal, state, or local law requiring equal opportunity for qualified special disabled veterans, veterans of the Vietnam Era, recently separated veterans, or any other U.S. veterans who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized (collectively, “covered veterans”) or for disabled persons; or opposing any act made unlawful by Section 503, VEVRAA , or their implementing regulations, or any other Federal, state, or local law requiring equal opportunity for disabled persons or covered veterans; or
- Exercising any other right under Section 503, VEVRAA, or their implementing regulations.

If JVT Advisors determines that inappropriate conduct has occurred, disciplinary action up to and including immediate discharge will be taken. Appropriate action may also be taken to deter any future harassment.

If you believe you have been harassed on the job, or if you are aware of the harassment of others, please provide a written or oral report to your supervisor or representative at JVT Advisors immediately. JVT Advisors will endeavor to protect the privacy and confidentiality of all parties involved to the extent possible consistent with a thorough investigation.

I hereby affirm, under penalties of perjury that I have read and understand JVT Advisors’ Harassment Policy.

Contractor Signature: _____

Contractor Name: _____

Date: _____