

ZERO TOLERANCE ANTI HARASSMENT POLICY

POLICY

Oklahoma State Fair, Inc. has a policy of "zero-tolerance" with respect to unlawful employee harassment. We prohibit any form of unlawful employee harassment based on race, color, religion, sex, national origin, age, disability, sexual orientation, veteran status, genetic information, reprisal or any other group protected by state or local law. Creating a hostile work environment, improper interference with the ability of Oklahoma State Fair Inc. employees to perform their expected job duties and other types of harassment will not be tolerated.

WHO IS COVERED

Anybody you encounter as you perform your job at Oklahoma State Fair, Inc. is covered by this policy. This includes all applicants and employees regardless of position, title, grade, seniority or function, as well as our customers, visitors, independent contractors and vendors. Nobody is immune from this policy.

WHAT IS PROHIBITED WORKPLACE HARASSMENT

Sexual harassment has been defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

1. Submission to such conduct is either made explicitly or implicitly a term or condition of employment;
2. Submission to or rejection of such conduct is used as the basis for employment decisions; or
3. Such conduct has the purpose or effect of unreasonably interfering with the work environment or creating an intimidating, hostile or offensive work environment.

Sexual harassment can be subtle or direct. It usually involves different genders, but may be committed by someone of the same gender. Sexually harassing behavior may include intentional physical conduct that is sexual in nature, sexual jokes and innuendo, sexual advances or requests for sexual favors, propositions, verbal abuse of a sexual nature, commentary about an individual's body, sexual prowess or sexual deficiencies, leering, touching, sexually based obscene comments or gestures, display of sexually suggestive objects or pictures and any other type of physical, verbal or visual conduct of a sexual nature.

Examples of the types of conduct expressly prohibited by this policy include, but are not limited to the following:

- Touching, such as rubbing or massaging someone's neck or shoulders, stroking someone's hair, or brushing against another's body.
- Sexually suggestive touching.
- Grabbing, groping, kissing, fondling.
- Violating someone's "personal space."

- Whistling
- Lewd, off-color, sexually oriented comments or jokes.
- Foul or obscene language.
- Leering, staring, stalking.
- Suggestive or sexually explicit posters, calendars, photographs, graffiti, cartoons.
- Unwanted or offensive letters or poems.
- Sitting or gesturing sexually.
- Sexually oriented or explicit remarks, including written or oral references to sexual conduct, gossip regarding one's sex life, body, sexual activities, deficiencies, or prowess.
- Questions about one's sex life or experiences.
- Repeated requests for dates.
- Sexual favors in return for employment reward, or threats if sexual favors are not provided.
- Sexual assault or rape.
- Any other conduct or behavior deemed inappropriate by the State Fair.

The same types of behaviors, comments, jokes, pictures or other things which are directed toward a person's race, national origin, religion, disability, age or other characteristics can also be harassment. Just like sexual harassment, these types of conduct will not be tolerated. All employees are responsible for treating their coworkers with respect and encouraging others to do the same.

OTHER OBLIGATIONS OF ALL EMPLOYEES

It is an essential responsibility for every employee to report any incidents of actual or perceived harassment. This includes harassment directly involving the employee, or where the employee is only a witness. Every employee must consider the obligation to report harassment as an essential function of their job.

PROFESSIONAL ENVIRONMENT

Our work environment is such that many individuals interact with each other every day. Differences of opinion, discomfort with personality traits and even anger are inevitable. Please understand that those types of reactions do not generally amount to sexual or other harassment, unless they are of a sexual nature or based upon gender, race, national origin, religion, age or disability, but we still want our workplace to be both interactive and professional. Tolerance of others is expected.

HOW TO REPORT HARASSMENT

Allegations of harassment may be reported in any manner that effectively communicates the message you desire to send. This includes reporting in writing, orally, by e-mail, letter, memo or note or any other reasonable means. The State Fair encourages all reports to be made in writing in order to have a clear and complete account of your perception of the situation. The most beneficial written reports will include at least:

1. The dates and times of all incidents of harassment;
2. The names of all harassers and victims;
3. A detailed factual description of the harassment; and
4. The names of all individuals present during the challenged conduct or who otherwise could corroborate or refute the facts alleged.

You should also remember that a good first step in resolving a problem of harassment is to directly confront the harasser, clearly communicating what behavior you deem unacceptable. In many instances, this alone will stop the undesirable behavior because the harasser does not realize the inappropriateness of the conduct. If you do not feel that such a step is appropriate, however, you may report the problem elsewhere, as discussed below.

WHERE TO REPORT

Any reports of harassment need to be reported to Angela Nemecek, Vice President of Human Resources and Administration at 948-6711 or 550-8349. If you are uncomfortable going to Human Resources you may make your complaint to your direct supervisor. If for any reason those options are uncomfortable for you, you can report your complaint or information to one of the following people:

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|----|----------------|--------------------------------|----------------------|
| 1. | Bill Allen | Vice President, Fair Park | 948-6740 or 520-3518 |
| 2. | Gina Burchfiel | Vice President, Fair | 948-6722 |
| 3. | Jason Eddy | Vice President, IT | 948-6817 |
| 4. | Scott Munz | Vice President, Marketing & PR | 948-6737 |
| 5. | Gary Orosco | Vice President, Sponsorships | 948-6726 |
| 6. | Cindy Rogers | Vice President, Finance & CFO | 948-6835 |
| 7. | Bert Benear | Associate VP, Fair Park Events | 948-6741 |

It is much more important that you report your complaint or information than that you report to the “right” person. A report to any member of management at the Oklahoma State Fair, Inc. will be sufficient to bring your complaint or information to the attention of the proper individuals.

WHEN TO REPORT

Immediately.

The more promptly an issue is raised, the more likely an appropriate resolution can be reached. Untimely reporting significantly increases the difficulty in conducting an investigation because the precision with which events and statements are remembered fades with the passage of time.

INVESTIGATIONS

In most cases, a prompt investigation will immediately follow the reporting of behavior believed to constitute harassment that violates this policy. Any such investigation will be designed to address the allegations made, but will usually include detailed interviews of the persons directly involved, witnesses, and review of any documentary items that tend to support or refute the allegations.

Investigations will be kept as confidential as practical; but in keeping with our desire to conduct a thorough review of all facts and events, absolute confidentiality is not feasible.

APPEALS

If you strongly disagree with the decisions reached as a result of the investigation, you may take the matter to our President/CEO, Tim O'Toole. Any such appeal must be in writing and set forth detailed information about your dissatisfaction with the determinations made and your suggestion on what the appropriate course of conduct should have been. Once received, Mr. O'Toole will review your appeal and other pertinent information and reach a decision. This final decision will be communicated to you.

DETERMINATIONS

In instances where sufficient information is available, the State Fair will promptly make factual and disciplinary determinations about the challenged conduct. However, you should keep in mind that some inappropriate behavior is not reflected in documents or witnessed by other people. In those situations, individual credibility determinations will have to be made and we will strive to do our best at making those determinations correctly. These credibility issues should not discourage you from reporting harassment, but should illustrate the importance of having documents, witnesses and other information available if you can to assist the State Fair in reaching its determination. All determinations will be based upon a totality of the circumstances then known to us.

DISCIPLINE

Any employee engaged in sexual or other harassment will be subject to discipline, up to and including discharge. This includes first-time offenders. All disciplinary decisions will be made on a case-by-case basis.

RETALIATION

Any act of retaliation against an employee who reports, participates in an investigation of harassment or is otherwise involved in such an inquiry is strictly forbidden. Any employee found to have retaliated against another person will be subject to the same type of discipline as an employee who is found to have harassed another person.

CONSENSUAL ROMANTIC RELATIONSHIPS

Consensual relationships between employees who are peers are not prohibited, but may be unwise. If such a relationship does not last it can provide the groundwork for one or both of the employees to make allegations of harassment against the other. This is an instance where the credibility determinations discussed above are quite difficult. The only way to avoid this situation is not to engage in this type of behavior in the first place. The best practice is to keep your private life private and out of the workplace.

FALSE CLAIMS

Workplace harassment is a very serious matter, in part because of the way they can affect people and their careers. Accordingly, while all legitimate claims of sexual or other harassment must be reported, such claims must never be fabricated, or lodged without the utmost sincerity. Any person found to have intentionally falsified a claim of harassment, or who lodges a claim for malicious or improper reasons, is subject to immediate discipline, up to and including discharge.

TRAINING

Employees will be routinely trained on issues involving sexual and other types of harassment. This will entail various forms and methods designed to heighten your awareness and education on the subject. You should also keep and regularly review a copy of this policy.

ADDITIONAL TRAINING

If at any time you do not believe you are sufficiently aware of what is acceptable behavior, do not understand this subject well enough, or simply need another copy of the State Fair's Zero Tolerance Anti-harassment Policy, please contact Angela Nemecek, Vice President of Administration and Human Resources at 948-6711 or 550-8349.

ACKNOWLEDGEMENT AND AGREEMENT

Copy #1 (keep with your copy of the Policy)

By signing this document, I am confirming that I have been given a written copy of Oklahoma State Fair, Inc.'s Zero Tolerance Anti-Harassment Policy. I am also confirming that I have read the Zero Tolerance Anti-Harassment Policy, understand what it says and have been given the opportunity to ask all questions I have about its application. I agree to comply with this Policy and am committed to doing whatever I reasonably can to ensure that the work environment remains free of harassment.

Signature

Printed Name

Date

ACKNOWLEDGEMENT AND AGREEMENT

Copy #2 (sign and return to your supervisor promptly)

By signing this document, I am confirming that I have been given a written copy of Oklahoma State Fair, Inc.'s Zero Tolerance Anti-Harassment Policy. I am also confirming that I have read the Zero Tolerance Anti-Harassment Policy, understand what it says and have been given the opportunity to ask all questions I have about its application. I agree to comply with this Policy and am committed to doing whatever I reasonably can to ensure that the work environment remains free of harassment.

Signature

Printed Name

Date