Sexual Harassment

Lee Enterprises is committed to a work environment that promotes equal employment opportunities and is free from discrimination and harassment. Sexual harassment constitutes discrimination and is strictly prohibited by Lee Enterprises. For purposes of this policy, sexual harassment is defined, as in The Equal Employment Opportunity Commission Guidelines, 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 made either explicitly or implicitly a term or condition of an individual's employment; or
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual’s body, sexual prowess, or sexual deficiencies; leering, whistling, or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

This policy applies to all applicants and employees, whether related to conduct engaged in by fellow employees or someone not directly connected to Lee Enterprises such as an outside vendor, consultant or customer.

Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events. Conduct prohibited by this policy may also occur through the use of electronic communications and social media, such as e-mail, personal websites, online chat services, blogs, Facebook, Twitter, Myspace, YouTube, and LinkedIn.

Lee Enterprises encourages reporting of all perceived incidents of sexual harassment, regardless of the offender’s identity or position. Any employee who believes that he or she is being sexually harassed must promptly take the following steps:

1. Politely, but firmly, confront the offender, explain that the behavior is unwelcome and request that it stop. If you prefer not to address the offender directly, you should proceed to the step outlined below.
2. If the offensive behavior continues or if you are uncomfortable talking to the person directly:
   - Talk to your supervisor, department manager, enterprise human resources manager, enterprise operating executive or operating vice president.
   - If you are uncomfortable with speaking to someone at your enterprise, you may call the Lee Open Door Line at 1-877-LEE-4YOU (1-877-533-4968) to request assistance.
   - If you believe that inadequate action is being taken to resolve the complaint after a reasonable length of time, you should discuss the problem with the Vice President of Human Resources (1-563-383-2141).

All complaints will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. Employees are expected to fully cooperate in any such investigation. A refusal of an employee to cooperate in an investigation shall result in disciplinary action, up to and including termination.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.
Retaliation against an individual for reporting sexual harassment or for participating in an investigation of a claim of sexual harassment is a serious violation of this policy and, like harassment itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Misconduct constituting sexual harassment or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling and/or disciplinary action such as warning, reprimand, suspension or termination as Lee Enterprises believes appropriate under the circumstances.

Questions regarding specific situations or this policy should be directed to your supervisor or the Director of Human Resources.