



AMERICAN SCHOOL OF CLASSICAL STUDIES AT ATHENS

FOUNDED 1881

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ASCSA PERSONNEL POLICIES AND REGULATIONS INTRODUCTION

This document has been prepared to acquaint you with the policies of the American School of Classical Studies at Athens (“ASCSA” or the “School”). The ASCSA community includes employees as well as many individuals who are not employees in the strict sense: members at all levels (regular, student associate, senior associate), participants in summer programs and affiliated research projects (students, researchers, hired workers), members of the Managing Committee, Trustees, Overseers, vendors, suppliers and contractors. **Anytime these non-employee affiliates are acting within their roles as affiliates of the ASCSA they are protected by and expected to abide by these policies.**

The terms and conditions of employment for all employees are defined in their letters of employment. Because no two employment situations are ever exactly alike, the ASCSA's policies must have some flexibility; our goal is to treat employees fairly; thus, the ASCSA may modify the policies summarized here on those occasions when it determines that particular circumstances warrant individualized consideration. For employees hired under United States laws, the ASCSA is not contractually or otherwise legally bound by these policies. For those hired under Greek law, the contents of Part I, here, and the Personnel Policy for Greek Employees (see “ASCSA Personnel Greece Regulations” here <https://www.ascsa.edu.gr/about/governance/managing-committee-documents>), however, are legally binding in so far as the terms do not contradict terms of employment specified in the employees’ contract of employment. The policies summarized in this document have been adopted voluntarily by the ASCSA.

Separate benefit booklets describe benefits summarized only briefly here. The actual provisions of each benefit plan or contract will govern if there is any inconsistency between this summary and the ASCSA’s formal plans or contracts.

The ASCSA reserves the right to interpret the policies as it deems appropriate in its sole discretion. The ASCSA also reserves the right, in its sole discretion, to amend, modify, deviate, change, cancel, terminate or withdraw any or all of the policies, at any time and for any or no reason and with or without prior notice. For employees hired under Greek law any changes to Part I, here, and the School's Personnel Policy for employees hired under Greek Law (reference "ASCSA Personnel Greece Regulations" for details) must be made in accordance with procedures provided by Greek Law.

We emphasize that the prohibitions against discrimination, inappropriate conduct, retaliation and harassment set forth in these polices apply not only to the conduct of employees of the ASCSA but also to the conduct of non-employee affiliates (for example, members at all levels, participants in summer programs and affiliated research projects, members of the Managing Committee, Trustees, Overseers, vendors, suppliers and contractors) with whom our employees interact in the course of their employment with the School. Consequently, if you feel discriminated, retaliated against or harassed (sexually or otherwise) by a non-employee in the course of your employment or affiliation with the ASCSA, you should use the procedure set forth in these policies. Conversely, the prohibitions against discrimination, harassment and retaliation set forth in these policies apply to your conduct relative to employees and non-employees with whom you come into contact in the course of your employment with the School.

The ASCSA is an Equal Opportunity Employer. We are committed to a healthy workplace environment that encourages growth and respect for all current and prospective employees based upon job-related factors such as their educational background, work experience, and ability to perform the essential functions of a particular job.

DEFINITION OF TERMS¹

There are several terms used throughout this document that have very specific meanings. These terms are used frequently, and their meanings may not be immediately obvious or they may be subject to misinterpretation. Unless specifically stated otherwise, the definitions provided below apply whenever the defined term is used in this document. In cases where situations differ for U.S.-based staff and staff not hired under the European Union law or Greek law in Greece, we will follow the applicable law.

1. Permanent vs. Temporary

Every employee is classified as either "permanent" or "temporary" as defined below.

Permanent:	An employee who is hired (1) to fill a position that is expected to exist for more than one year, AND (2) not for a specific project. This will include officers of the School appointed by the Managing Committee to fixed-term positions.
Temporary:	An employee who is hired (1) to fill a position that is not expected to exist for more than one year, OR (2) to complete a specific project.

¹ In this document, "Athens" or "Greece-based" includes employees of the School located in Athens or elsewhere in Greece. "U.S." and "U.S. Offices" includes the U.S. administrative offices and the Publications Office.

2. Full-time vs. Part-time

All employees are classified as either “full-time” or “part-time” as defined below.

- Full-time: An employee who is normally scheduled to work at least thirty-five hours each week, excluding lunch and other breaks.
- Part-time: An employee who is normally scheduled to work fewer than thirty-five hours each week, excluding lunch and other breaks.

3. Exempt vs. Non-exempt

Every employee is classified as either "exempt" or "non-exempt" as defined below.

- Exempt: An employee who is exempt from the minimum wage and overtime provisions of the Fair Labor Standards Act (Wage-Hour Law) as amended and state law. These individuals do not receive overtime pay for working more than the forty hours per week as stated in the FLSA. Included among exempt employees are executive, professional, and some administrative staff (see list).
- Non-Exempt: All other employees who are not exempt from minimum wage and overtime positions of the Fair Labor Standards Act (Wage-Hour Law) as amended. The provisions of this law require overtime pay (at time and one-half) for all hours worked in excess of forty hours (excluding lunch and other breaks) per week (or as negotiated) unless otherwise required by applicable state law.

4. Supervisor

Throughout this document, the term “supervisor” refers to the individual to whom an employee reports for administrative purposes. This individual is responsible for performance reviews, compensation reviews, and any other administrative matters related to an individual employee.

5. Length of Employment

The availability and level of certain employee benefits (*i.e.* vacation and sick days) are based on an employee’s length of employment with the School and in some cases past professional related experience. For these purposes, length of employment is measured from an employee’s first day of employment through the last day actually worked, provided that employment has been continuous.

6. Non-employee Affiliate

Any individual who is not an employee in the strict sense: members at all levels (regular, student associate, senior associate), participants in the School’s summer programs, participants in affiliated research projects (students, researchers, hired workers), members of the Managing Committee, Trustees, Overseers, vendors, suppliers and contractors.

At-Will Statement: Unless otherwise stated in writing, employment by ASCSA is “at-will.” You are not guaranteed employment or any particular job or type of work for any specified period of time. More specifically, because your employment is at-will, both you and

the ASCSA have the right to terminate your employment at any time and for any or no reason. While the ASCSA may follow a disciplinary process from time to time, nothing in this Handbook or its application shall restrict the right of the ASCSA to terminate employees at-will. Likewise, membership or any other non-employee affiliation with the School may be terminated at any time for any or no reason.

PART I. GENERAL STATEMENT OF POLICY

This document collects and sets forth the policies and regulations adopted by the American School of Classical Studies at Athens ("the School") concerning personnel matters. Part I applies to all employees of the School as well as non-employee affiliates wherever they are based. Part II applies to all staff in the United States and staff in Greece not hired under European Union law or Greek law.

Employment procedures, job descriptions and personnel files

1.1 The Regulations of the Managing Committee define hiring practices and terms of employment for all Officers of the School and officers of the Managing Committee.

1.2 The U.S. and Athens offices will maintain current job descriptions for Officers of the School, for employees in the U.S., and for other professional staff employees in Greece.

1.3 The U.S. office will maintain the official personnel records for all U.S.-based employees and all employees based in Greece but hired under U.S. law. The Athens office will maintain the official personnel records for all employees based in Greece, hired under Greek/EU law.

EQUAL OPPORTUNITY POLICY

2.1 The School protects your right to have an educational and working community free from unlawful discrimination, harassment and retaliation and other inappropriate behavior as described in this Policy. Similarly, you are prohibited from engaging in unlawful discrimination, harassment and retaliation and other inappropriate behavior as described in these policies. This entire Equal Employment Opportunity Policy Statement applies to all of the School's officers, managers, supervisors, trustees, overseers, members of the Managing Committee, members at all levels, participants in affiliated projects, research personnel, employees and applicants. All such individuals are both protected under and restricted by this entire policy.

2.2 The School provides equal opportunity for employment and expressly prohibits any form of unlawful employee harassment to all applicants and employees without regard to age, sex, sexual orientation, gender identity, AIDS/HIV status, hereditary cellular or blood trait, genetic information, pregnancy, race, color, religion, creed, national or ethnic origin, ancestry, citizenship, immigrant status, military status, veteran status, marital status, family status, domestic partner status, civil union status, unemployment status, disability or handicap, and perceived or actual membership in any other protected class.

2.3 The School will not unlawfully consider an individual's membership in any protected group as defined above with regard to: interviewing, hiring, compensation, benefits, training, assignments, evaluations, coaching, promotions, discipline, discharge and layoffs. Nor will the School unlawfully consider an individual's membership in any protected group as defined above with regard to applications for membership at any level, for research permits, or for fellowships, grants or scholarships.

2.4 The School's policy on equal employment opportunity supports and is consistent with the School's commitment to enhancing diversity and inclusiveness. Diversity means not only membership in the various "protected groups" identified above, but also diversity in experience, perspective, ideas, style and contacts. We believe that we are much stronger as a School as a result of the richness of our diversity and strive to ensure that we have policies and practices that are respectful of diversity and promote inclusion.

2.5 Professional behavior and civility are expected of all members of the School community, both employees and non-employee affiliates. Exploitation, discrimination, harassment of all types, and abuse are damaging to morale and collegiality, and will not be tolerated by the School. Officers of the School, all permanent and temporary staff, all short or long-term members of the School, including all personnel on affiliated research projects, as well as members of the Managing Committee, Trustees of the School, and the Overseers of the Gennadius Library, should avoid inappropriate behavior and promote a collegial atmosphere.

The following behaviors, communications, etc. are inappropriate, and as such, prohibited, regardless of whether they are illegal:

Examples

- Derogatory comments about an individual's membership in any protected group, for example, the "old guy" or "the mommies";
- Displays of cartoons, calendars, computer software, pictures, etc. which are degrading to or reflect negatively upon any protected group;
- "Jokes," comments or stories which have the purpose or effect of stereotyping, demeaning or making fun of any protected group, for example, Pope "jokes" or pregnancy "jokes";
- Slurs to describe any protected group, for example, the "N" word, the "C" word, or "R" head for a person from the Middle East;
- Verbal or non-verbal innuendo which relates to or reflects negatively upon any protected group, for example, mimicking a disabled employee's walk or a foreign national's accent;
- Hate symbols or other symbols which suggest the inferiority of any group, for example, a noose or a swastika;
- Racist, sexist or other hate-based graffiti;
- Inappropriate questions or comments about attire associated with an individual's religion or ethnicity;
- Inappropriate questions or comments about an employee's sexual orientation or gender identity;
- Hostile, abusive or demeaning behavior, including threats, directed at an employee because of membership in any protected group, even if not racial, ethnic, religious, etc. in nature;
- Stereotypic or biased comments or slurs about any protected group, for example, "They are..." ("they" refers to a protected group, such as Latinos);
- Comments that suggest an employee does not conform with stereotypic, such as "You don't act gay...."; and/or
- Any other inappropriate behavior of the kind or similar to that referred to here or elsewhere in this policy.

2.6 Sexual harassment is a form of sex discrimination which the School does not tolerate. Below, we include specific examples of inappropriate conduct. It is not our intent to make anyone uncomfortable. To the contrary, we provide specific examples to help avoid confusion over whether behavior is appropriate. If you have any question as to whether behavior may be

inappropriate, don't do it. Consistent with the foregoing, the following behaviors are prohibited, regardless of gender:

- To threaten or insinuate, expressly or implicitly, that any person is required to submit to sexual advances or to provide sexual favors as a condition of employment, continued employment or any term, condition or benefit of employment, or that a person's refusal to submit to sexual advances or to provide sexual favors will affect adversely the person's employment, continued employment or any term, condition or benefit of employment.
- To engage in unwelcome sexually-oriented or otherwise hostile conduct which has the purpose or effect of interfering unreasonably with another person's work performance or of creating an intimidating, hostile, abusive or offensive working environment. Whether something is unreasonable is determined from the perspective of the person experiencing the conduct (not the person engaging it).

Examples:

- Requesting a date from someone after the recipient of the request already has said "No" to a prior request;
- Providing preferential treatment to someone with whom the employee is having a sexual or romantic relationship;
- Sexually assaulting another individual;
- Engaging in unwelcome and/or inappropriate physical contact, such as patting, pinching or brushing against another person's body;
- Engaging in sexual bantering, "jokes" and "teasing";
- Making sexual, suggestive or biased "jokes";
- Making gender biased or stereotypic comments or other communications;
- Engaging in sexual flirtations, or making sexual advances or propositions;
- Engaging in verbal abuse of a sexual nature;
- Making verbal commentaries about an individual's body, sexuality, or sexual orientation;
- Making disparaging, stereotyping or other inappropriate comments about pregnancy;
- Using sexually-degrading language about an individual (verbally or otherwise);
- Engaging in discussions of, or questions and comments about, sexual desires, fantasies, experiences, frustrations or the like;
- Transmitting, showing or describing pornographic or obscene materials, or other similar communications of any kind;
- Transmitting, showing or describing sexually-explicit or sexually-suggestive objects, cartoons, software, photos, pictures, drawings or other communications;
- Making sexually-oriented or degrading gestures;
- Engaging in verbal or non-verbal innuendo of a sexual, suggestive or biased nature;
- Engaging in other non-verbal communications of a sexual or suggestive nature, such as leering or gawking;
- Using obscene, off-color or otherwise hostile language of a sexual, suggestive or biased nature;
- Referring to individuals or groups of a specific gendered identity in pejorative, negative or demeaning terms;

- Engaging in any other behavior of a hostile or abusive nature directed at one gender group, even if not sexual in nature; and/or nature;
- Engaging in any other inappropriate behavior of the kind, or similar to that, referred to here or elsewhere in this policy.

2.7 This prohibition against sexual harassment shall not be construed as in any way preventing or discouraging the proper academic consideration of objects and texts that may be of an obscene nature in the context of teaching and research, whether in the classroom or on site.

2.8 It is important to remember that these prohibitions set forth above apply not only to oral and written communications, but also to e-mail, voicemail, internet communications and searches, and other technology-assisted communications.

2.9 The prohibitions on inappropriate behavior set forth above apply not only in the workplace itself but also to all other work-related settings, such as off-site work meetings and seminars, field projects, conferences and work-related social functions.

2.10 It is of no defense to inappropriate behavior that there was no bad intent, that it was only a “joke,” or that it was not directed at any particular person.

2.11 If you believe you have experienced discrimination, inappropriate behavior or harassment, you should follow the procedure in **section 14** below.

Intimate Relationships

3.1 While personal relationships may develop in a professional setting, there are restrictions. While you have a right to say “yes” to personal invitations (such as a request for a date), you also have an absolute right to say “no.” Personal relationships between employee or non-employee affiliate and supervisor are strongly discouraged but are not prohibited.

3.2 If anyone encounters or feels any unwelcome pressure to become intimately involved with any employee (officer, department head, manager, supervisor, co-worker, etc.) or non-employee (member, trustee or overseer, member of Managing Committee, customer, vendor, supplier, etc.), such person is urged to use the procedure set forth below. Employees and non-employee affiliates are prohibited from retaliation against anyone who refuses to enter into an intimate relationship (for the complaint and anti-retaliation policies, see **section 14**)

3.3 In the absence of a complaint (utilizing the procedure in **section 14**), the School will assume that any relationship is entirely consensual and welcome.

3.4 To avoid actual, potential or perceived favoritism, should a supervisor develop a consensual, intimate relationship with someone who is their direct report or otherwise in their chain of command, or if the supervisor at issue has institutional authority, the supervisor must notify the Director of the School in Athens or Chair of the Managing Committee in the U.S. Failing to provide such notification, a supervisor may be subject to disciplinary action.

3.5 In circumstances where a consensual, intimate relationships does exist where one person would otherwise make discretionary decisions that could affect the other person, the decision-making authority shall be transferred to the next level of the reporting chain. If you have any doubt about whether you need to consult with your supervisor, play it safe and consult.

Reasonable Accommodations

4.1 When individuals, whether employees or non-employee affiliates, with physical or mental disabilities (including disabilities caused by, exacerbated by, or related to pregnancy or childbirth, including recovery from childbirth) or handicaps notify the School of such disabilities

or handicaps and request reasonable accommodations (such as a leave of absence) for such disabilities or handicaps, the School will make reasonable accommodations on behalf of such individuals.

4.2 Similarly, when individuals notify the School of pregnancy (including pregnancy, childbirth, or medical conditions related to pregnancy or childbirth, including recovery from childbirth) and request reasonable accommodations relating to the same, the School will make reasonable accommodations on behalf of such individuals, regardless of whether they are disabled.

4.3 Finally, when individuals notify the School of sincerely-held religious observances, practices and beliefs and request reasonable accommodations relating to the same, the School will make reasonable accommodations on behalf of such individuals.

4.4 Upon receiving a request for a reasonable accommodation, the School will comply with its legal obligation to engage in an interactive process to make an individualized determination of whether and how a reasonable accommodation can be provided. An individual does not have to use the words “reasonable accommodation” or “disability,” for example, in order to make a request.

4.5 Under each of the circumstances above, no accommodation will be made if it imposes an undue hardship on the School.

4.6 The School will treat a medical condition or complication that is caused or exacerbated by pregnancy no differently from other medical conditions for the purpose of determining whether an individual is disabled, engaging in the interactive process, and evaluating whether an individual is entitled to a reasonable accommodation (e.g., leave of absence and/or time off).

4.7 If you believe you need an accommodation for any of the reasons set forth above, please contact your supervisor.

4.8 If you are not satisfied with any accommodation offered by the School, or with the School’s denial of your request for a reasonable accommodation, you may challenge such decision by using the complaint procedure in **section 14** below.

4.9 If you are a supervisor and anyone requests an accommodation of you, you must report this to the Chair of the Managing Committee in the U.S., or the Director of the School in Athens. You may neither keep the request confidential nor resolve the request on your own. If you are not sure whether you have a duty to report, play it safe and report.

DRUG-FREE WORKPLACE

5.1 The School, as a matter of institutional policy and as required by law, is committed to the prevention of unlawful possession, use, or distribution of illegal and illicit drugs and alcohol by employees and all non-employee affiliates.

5.2 Reporting to work under the influence of alcohol or other drugs (excluding proper use of over-the-counter or prescribed medication), and the abuse of legal prescription pharmaceuticals diminish the safety of all employees and visitors, can have severe health and personal consequences, and impair the reputation of the School. These abuses also account for losses in efficiency and attendance, and increase costs of School-provided health care. Therefore, the School has adopted a zero-tolerance drug and alcohol policy. With this policy, it is the intention of the School to use every lawful means to establish and maintain a drug and alcohol-free working environment. This policy does not apply to the moderate consumption of alcohol during School-sponsored receptions or other events that are part of an employee’s or non-

employee affiliate's duties, so long as that consumption does not violate the policy on Fitness for Duty, section 5.8, below.

5.3 This policy addresses illegal drugs² and the unauthorized use of legal drugs, such as expired prescriptions, or other substances that are controlled or outlawed, are obtainable by lawful methods, or are legally obtainable but were not obtained in a lawful manner.

5.4 The School prohibits the use, sale, manufacture, distribution, dispensation or possession of illegal drugs, drug paraphernalia or any combination thereof, wherever the employee or affiliated non-employee is performing job duties during the Work Day.³ This includes the School's vehicles on or off the School's premises. Operation of the School's vehicles on or off the School's premises while under the influence of alcohol is also prohibited. Violation of this policy will subject the employee or affiliated non-employee to disciplinary action up to and including immediate termination and may have legal consequences.

5.5 If you are taking any prescription or over-the-counter medication⁴ which could interfere with your ability to perform your job safely, please inform your supervisor so that alternative responsibilities can be explored.

5.6 The School is a smoke-free work place. The use of tobacco, in any form, is not permitted inside School buildings, or in School vehicles. Smoking and the use of e-cigarettes is prohibited both on the School's grounds at Soudias St., Athens, and on the property of the School offices in Princeton. Smoking is permitted on School property in Ancient Corinth only in designated areas. Employees and affiliated non-employees observed in violation of this policy may be subject to disciplinary action.

5.7 An employee or affiliated non-employee who believes that he or she may have a drug and/or alcohol problem is encouraged to get help. Accordingly, if you need an accommodation because of a substance abuse problem, it is your responsibility to make this request to your Supervisor. Employees may be allowed to take unpaid leave pursuant to School policies and/or as required by law in order to participate in a rehabilitation program.

Fitness for Duty

5.8 As an employee or affiliated non-employee of the School, you are required to be fit-for-duty at all times during the work day or while on School premises. The School reserves the

² For purposes of this policy, illegal drugs includes (1) any chemical substance whose manufacture, use, possession or sale is prohibited by applicable law; (2) any legally-dispensable controlled substance (medications available only as prescribed by a licensed physician) obtained fraudulently or used by any individual other than the person for whom prescribed; (3) any prescription or over-the-counter medication capable of impairing one's alertness and/or physical or mental reflexes taken for purposes of abuse or misuse.

³ Work Day includes, in addition to actual working time, break and meal periods, if the employee returns to work after such break or meal period, regardless of whether the individual is on School premises during such time and regardless of whether the individual is paid for such time.

⁴ "Prescription or Over-the-Counter Medication" is defined as medication normally taken for medicinal or other legitimate reasons, consistent with directions of a physician or, in the case of over the counter medications, consistent with the directions on the package.

right to determine that an employee or affiliated non-employee is unfit-for-duty without regard to the need for a drug and/or alcohol test.

5.9 Any employee or affiliated non-employee who knows or believes that other employees, members, vendors or guests have engaged or are engaging in conduct prohibited by this policy, should immediately refer this information to their supervisor or to the Chair of the Managing Committee in the U.S or Director of the School in Athens.

CONFLICTS OF INTEREST

6.1 The purpose of the School's Conflict of Interest Policy (see "Conflict of Interest Policy" available here <https://www.ascsa.edu.gr/about/governance/managing-committee-documents>) is to protect the School when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an employee, officer, trustee, supervisor or member of the School. A copy of the Conflict of Interest Policy is provided to each Trustee and Officer, and each employee with budgetary, purchasing or negotiating power upon that person being elected, appointed or hired. The receipt of this Policy and agreement to comply with it must be acknowledged at that time and renewed annually. Records of this acknowledgment will be kept in the appropriate School files.

6.2 All school employees and affiliated non-employees (as defined in the INTRODUCTION and in Sections 2.1 and 2.5, above) shall refrain from engaging in outside activities or financial interests incompatible with the goals of the School or which affect adversely the effective performance of their duties. In so far as doing so is incompatible with the values of the School and the ethical statements of the Archaeological Institute of America and the Society for Classical Studies, they must also refrain from dealing with antiquities in any way that contravenes the laws of the U.S., Greece or other neighboring countries, or the UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property.

6.3. It is important to avoid even the appearance of a conflict of interest between employees, officers, trustees, supervisors or members of the School. Persons immediately related by blood or marriage to existing employees or staff of the School may be employed by the School and its entities. In such circumstances, however, the School will undertake to ensure that one immediate relative will not be responsible for administrative decisions (including but not limited to annual reviews, discretionary decisions, promotions, etc.) related to the other. Immediate relatives are spouses, parents, siblings, and children, as well as people in those categories with a "step" or "in-law" relationship or any other member of the person's immediate household. An administrative superior is one who recommends the appointment or promotion, supervises the work or certifies the salary of another.

Outside Employment

7.1 The School does not restrict an employee's right to do work outside the School as long as the work performed does not interfere with an employee's work performance and attendance or otherwise conflict with the interests of the School. Employees may not make inappropriate use of the School's facilities for their outside business activities.

7.2 However, if an employee wishes to accept a position from an employer other than the School, the employee is required to inform the Chair of the Managing Committee or the Director of the School for review to avoid any potential conflict of interest. Any actual or potential conflicts must be resolved in favor of the School's position. If such outside work is approved

and, subsequently interferes or conflicts with an employee's job at the School, he/she shall be asked to choose between the jobs.

7.3 This policy is not intended to discourage participation in community and civic affairs. These activities, however, should not interfere with or conflict the performance of regular duties at the School.

CONFIDENTIALITY

8.1 In the course of performing your duties on behalf of the School, you may, from time to time, be placed in a position of trust and confidence in which you receive or contribute to the creation of confidential and/or proprietary information relative to the operations of the School. This confidential and/or proprietary information includes, but is not limited to, to the extent not generally known by or readily accessible to the public:

- Trade secrets;
- Business, manufacturing, marketing, legal and accounting methods, policies, plans, procedures, strategies and techniques;
- Information concerning the School's earnings, production volumes and methods for doing business;
- Research-and-development projects, plans and results;
- Technical information, such as publications, studies, photographs or notes of archeological excavations;
- The names, addresses and telephone numbers of the School's vendors, donors, contractors, and suppliers;
- Customer lists and the names, addresses and telephone numbers of the School's current, former and prospective members, donors, subscribers, and customers;
- Pricing, credit and other financial information;
- Confidential information provided by or about a customer; and
- Any and all other confidential or trade secret information which is not known generally by or readily accessible to the public. This does not apply to your wages or other terms and conditions of employment, but it does apply to such information about another employee.

8.2 During your employment or as part of your non-employee affiliation with the School:

- You must protect this confidential and/or proprietary information and use and/or disclose such information only as necessary to further the School's business interests;
- You may not use or disclose such confidential and/or proprietary information for personal gain or for any purpose which does not further and/or which is inconsistent with the business interests of the School; and
- You may not use or disclose confidential and/or proprietary information which you acquired in the course of your employment with a prior employer.

8.3 In particular, and by way of example only, during your employment or other affiliation with the School:

- You should designate/mark as "confidential" any documents, records etc. which contain confidential and/or proprietary information in accordance with instructions given to you by your supervisor;

- You should secure (in order to limit access to) confidential and/or proprietary information in accordance with instructions given to you by your supervisor;
- You should disclose confidential and/or proprietary information internally only to those who have a “need to know” in the course of performing their jobs for the School;
- You should not discuss confidential and/or proprietary information in public areas where your discussion may be overheard;
- You should disclose confidential and/or proprietary information to non-employees only with the approval of and in accordance with guidelines given to you by your supervisor. In some cases, the non-employee may be required to execute a non-disclosure agreement; and
- You cannot take pictures, video or other images of confidential business information by way of your cell phone or other device. You cannot record conversations that include discussions of confidential business information by way of your cell phone or other device.

8.4 Upon your separation from the School, regardless of the reason and whether initiated by the School or you:

- You must return to the School, retaining no copies, any and all files, records, correspondence, documents, electronic diskettes, computer compact discs, computer and electronic-mail printouts, drawings, specifications, writings and similar items, which relate to or reflect the School’s business operations, customers, prospective customers, donors and prospective donors, employees, suppliers, vendors, etc., regardless of where such items were kept or prepared; and
- You may not use and/or disclose the School’s confidential and/or proprietary information at any time, at any place, for any reason.
- You may retain personal documents that relate to your personal taxes, benefits and the like.

8.5 An employee or non-employee affiliate who violates the Confidentiality Policy will be subject to appropriate disciplinary action, up to and including immediate discharge.

8.6 An employee (current or former) or non-employee affiliate who receives a request or demand for confidential information must report the request or demand immediately to the Chair of the Managing Committee or Director of the School along with a copy of the request or demand. The employee or affiliate must wait for guidance from them before responding to any request or demand so that the School can determine whether and how it can comply with the request or demand in light of laws that protect the confidentiality of information.

8.7 Further, nothing in this policy is intended to or shall be interpreted to prohibit disclosure of information to the limited extent permitted by and in accordance with the Federal Defend Trade Secrets Act of 2016 (“DTSA”). The DTSA provides that: “(1) An individual shall not be held criminally or civilly liable under any Federal or State trade secret law for the disclosure of a trade secret that – (A) is made – (i) in confidence to a Federal, State, or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.” The DTSA further provides that: “(2) An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the

individual and use the trade secret information in the court proceeding, if the individual – (A) files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order.”

8.8 Nothing in these policies is intended to or shall be interpreted: (i) to restrict or otherwise interfere with an employee’s obligation to testify truthfully in any forum; (ii) to restrict or otherwise interfere with an employee’s right and/or obligation to contact, cooperate with, provide information to – or testify or otherwise participate in any action, investigation or proceeding of – any government agency or commission (including, but not limited, to the EEOC); or (iii) to disclose any information or produce any documents as is required by law or legal process.

8.9 Exempt and non-exempt employees who violate this policy also may be suspended without pay. Exempt employees will be suspended without pay in full day increments only.

DATA PROTECTION NOTICE

9.1 This section describes how the American School of Classical Studies at Athens (hereinafter referred to in this section 10 as the "**Controller**") will process personal data of employees, members, trustees, and overseers in the context of their current or former affiliation with the School.

9.2 The Controller will process an employee’s personal data both for general staff administration (e.g., performance reviews) and to adhere to mandatory tax, social security and labor law obligations (e.g., withholding tax, paying social security contributions, etc.). It will also collect and process personal data in the context of evaluating the performance of employees in a non-automated manner, as provided in their contracts of employment and in accordance with applicable legislation

9.3 The Controller collects and processes personal data ("**Personal Data**") about employees and members when they apply for a position at the Controller and during their employment or affiliation with the Controller. Such data may include:

- name;
- passport/ID details;
- gender;
- CV;
- age/date of birth;
- marital status/history;
- details of dependents;
- annual reviews;
- bank account details;
- academic history;
- home address, email address and phone number;
- professional references;
- immigration status and, if applicable, all information necessary in the framework of a work authorization, work permit and residence permit;

9.4 The Controller processes this personal data for the following purposes:

- For purposes which are required by law:

- To fulfill tax, social security and/or labor law obligations (e.g., issuing pay slips, withholding taxes, affiliation with insurances, etc.)
 - In response to requests by government or law enforcement authorities conducting an investigation (e.g., upon social security inspection).
- Where the data subjects give their consent:
 - To post Personal Data (e.g., photos) on its website or social media accounts to promote events and the activities of the Controller
- To fulfill a contract, or take steps linked to a contract. This includes services rendered/offered by:
 - External associates for prevention of harm and protection at work;
 - insurance purposes;
 - to share personal data with organizations when it is necessary in the context of the Controller's activities
- As required by the Controller to conduct its business and pursue the Controller's legitimate interests, in particular:
 - carrying out evaluations or appraisals;
 - monitoring computer, email and internet use to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law;
 - investigating any complaints received from the employee or from others;
 - in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation)

9.5 Personal Data of employees may be shared with:

- attorneys or legal counsel representing the Controller;
- courts, tribunals, (arbitration) commissions, government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of its legitimate interests in compliance with applicable laws;
- third-party service providers, who will process Personal Data on behalf of the Controller for the purposes identified above. Such third-parties may include the health and safety officers mandated by law, insurance companies (e.g., hospitalization insurance, occupational work and accident insurance), external auditors, etc;

Details of data transfers outside the EU

9.6 Employee Personal Data may be transferred outside the EEA to the United States of America. Where information is transferred outside the EEA, and where this is to a third party, stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU-Commission-approved standard contractual clauses, an appropriate Privacy Shield certification, or Binding Corporate Rules. A copy of the relevant mechanism can be provided for an employee's review on request to the Controller. The Controller will implement, and undertakes that its data processors implement, appropriate

technical and organizational measures to ensure an appropriate level of security of employees' Personal Data.

9.7 Pursuant to the data protection legislation, including the EU General Data Protection Regulation 2016/679 ("GDPR"), as well as any legislation and/or regulation implementing or created pursuant to the GDPR and all other national applicable laws relating to the processing of personal data and privacy that may exist under applicable law, several rights are recognized, which an employee can in principle exercise free of charge, subject to statutory exceptions. In particular, employees have the following rights:

- right to access, review, and rectify their Personal Data. They may be entitled to ask the School for a copy of their information, to review or correct it;
- right to erasure: Employees have the right to erasure of all the Personal Data processed in case the Controller no longer needs it for the purposes for which the Personal Data were initially collected or processed;
- right to object or restrict processing: Under certain circumstances described in the data protection legislation, employees may ask for a restriction of processing or object to the processing of their Personal Data; and
- These rights may be limited, for example, if fulfilling a request would reveal personal data about another person, or if an employee asks the Controller to delete information which the Controller is required by law to keep or has compelling legitimate interests to keep.
- To exercise any of these rights, an employee can get in touch with the Controller, using the contact details set out below.

9.8 If any employee has unresolved concerns, he/she has the right to lodge a complaint with an EU data protection authority where he/she lives, work or where he/she believes a breach may have occurred. This is likely to be the Hellenic Data Protection Authority:

Hellenic Data Protection Authority

Postal Address:

Data Protection Authority Offices: Kifissias 1-3, 115 23 Athens, Greece

Call Centre: +30-210 6475600

Fax: +30-210 6475628

E-mail: contact@dpa.gr

9.9 If an employee has any queries or concerns about the way the Controller processes his/her personal data, he/she can get in touch by email or by writing using any of the following contact details:

Identity and contact details of the Controller:

American School of Classical Studies at Athens

Souidias 54, Athens, Greece

Representative of the Controller:

Director of the American School of Classical Studies at Athens

director@ascsa.edu.gr

Data Retention

9.10 Where the Controller processes employment-related personal data, it does so for the duration of employment of an employee at the Controller and for 5 years after this.

- Where the Controller processes personal data with an employee's consent, it processes the data until the employee asks it to stop and for a short period after this (to allow it to implement an employee's requests). The Controller may also keep a record of the fact that an employee has asked it not to process his/her data indefinitely so that the Controller can respect any such request in the future.
- Where the Controller processes personal data for (IT) security purposes, it will retain such data for 1 year.
- Where the Controller processes personal data in connection with performing a contract, it will keep the data for 5 years from the last interaction with the employee.
- Where the Controller processes personal data in the context of a lawsuit related to the employment relationship, it will retain it until all ways of redress have been exhausted and/or have reached their statute of limitations and for 5 years after this.

WORKPLACE VIOLENCE PREVENTION

10.1 The School strictly prohibits workplace violence. This policy applies to all of the School's officers, managers, supervisors, trustees, overseers, members of the Managing Committee, members at all levels, all participants in affiliated research projects, research personnel, employees, applicants, vendors, suppliers and contractors. All such individuals are both protected under and restricted by this entire policy. Ensuring workplace security is a responsibility we all share. Although the list below is not all-inclusive, the following behaviors are absolutely prohibited:

- **Threatening to harm any employee or non-employee affiliate.** Prohibited threats can be written or oral, expressed or implied. The fact that a threatening comment may have been made in jest is of no defense.
- **Threatening to cause damage to the School's affiliate.** Again, the fact that a threatening comment may have been made in jest is of no defense.
- **Possessing or concealing a weapon while on School premises or anywhere else while doing business for the School.** For purposes of this prohibition, a weapon is defined to include guns, rifles, firearms, knives, explosives, bombs and any and all other tools or instruments capable of inflicting harm to persons or property. School premises include the School's buildings, parking lots, surrounding grounds and motor vehicles, in Athens, Ancient Corinth, and Princeton. In the case of guns, rifles and other firearms, it is irrelevant that the person has a license or that the gun, rifle or firearm has no ammunition in it.
- **Physically assaulting, attacking or otherwise intentionally causing injury to any person with whom you interact in connection with your employment or other affiliation with the School.** The only narrow exception to this rule is an employee may use physical force in self-defense under circumstances in which the employee cannot withdraw safely from the situation without the use of physical force.
- **Intentionally causing damage to property belonging to the School or any employee or non-employee affiliate.**

- The prohibitions set forth above include comments made in jest or as a “joke” and apply to actions directed not only at employees and non-employees affiliates but also at persons associated with them (e.g., threats against an employee’s spouse).

10.2 We encourage you to speak with your supervisor, a member of the School’s security staff (if in Athens) or (if warranted and if in the United States) call 9-1-1 immediately in any of the following situations:

- You feel that you are being intimidated, threatened or harassed, verbally or physically, by a co-worker or anyone else with whom you do business or by a non-employee independent of your employment relationship with the School but feel you may be in danger at our workplace;
- You become aware of the existence of an individual on or near School premises under circumstances that you find suspicious;
- You become aware of any other action, situation or occurrence that you believe may threaten your personal safety or the well-being of those around you; or

10.3 The School will disclose information reported only to the extent necessary to conduct an adequate investigation and/or to take appropriate corrective action. The School will not permit any retaliation brought against an employee who, in good faith, registers a complaint or brings information to the School’s attention.

10.4 Additional comments on workplace security:

- Lock all valuables in your desk or locker. The School is not responsible for personal items you bring onto our premises.
- Do not challenge or confront a hostile or angry person. Attempt to defuse the situation and to remove yourself from the situation; then, notify your supervisor.
- Please speak to your supervisor if you have any ideas as to how we can make our workplace safer.

10.5 Any employee who violates any of the prohibitions set forth above will be subject to immediate discharge. The employee also may be subject to criminal prosecution. Exempt and non-exempt employees who violate this policy also may be suspended without pay. Exempt employees will be suspended in full day increments only.

SAFETY

11.1 The School emphasizes safe activity in the School facilities, offices, excavations, or other field research. Employees and non-employee affiliates are expected to follow safety guidelines as established by the local jurisdiction, their supervisor or project manager, to use personal protective equipment as required, and to follow safe handling practices when using tools, equipment and hazardous materials.

11.2 Employees and non-employee affiliates are expected to know the location of emergency equipment, first aid supplies, and how to locate emergency care services.

11.3 Employees and non-employee affiliates must inform the supervisor or project manager of known hazards, material defects or equipment malfunction in the work place.

Workplace Injury

12.1 Employees and non-employee affiliates who are injured while at work or traveling on School business are required to notify either the U.S. office or the office in Greece immediately, but within 48 hours, unless physically unable to do so. An employee's or non-employee affiliate's failure to immediately report a work accident or injury may result in an inability to collect workers' compensation insurance. If the injury requires medical treatment, the physician or hospital providing treatment should be informed that it is a work-related injury.

12.2 Employees who are injured at work are covered under the School's workers' compensation insurance policy. Non-employee affiliates are not covered under this policy. This coverage for employees provides medical treatment for you in the event you are injured or become ill as a result of your job duties, and also provides for income-continuation should job-related injuries or illnesses prevent you from reporting for work. The employee must be examined and treated, if necessary, by a doctor selected by the School for a period of up to ninety days from the date of the first visit.

REPORTING IMPROPER OR UNETHICAL CONDUCT

13.1 Any ASCSA employee or non-employee affiliate who reasonably believes that another School employee, officer, trustee, overseer, supervisor or member has committed an illegal act, fraudulent or dishonest conduct, or is involved in financial improprieties should report this immediately to the Chair of the Managing Committee or the Director of the School. If an employee or non-employee affiliate reasonably believes that the Chair of the Managing Committee or Director of the School is involved in any illegal activity or financial improprieties, the report should be made to the President of the Board of Trustees.

13.2 Fraudulent or dishonest conduct includes, but is not limited to, the following:

- Forgery or unauthorized alteration of documents;
- Unauthorized alteration or manipulation of computer files;
- Misrepresentation, fraud, false statements or deliberate error in the preparation, evaluation, review or audit of any financial statement or report;
- Misappropriation or misuse of organization resources, such as funds, supplies or other assets;
- Authorizing or receiving compensation for goods not received or services not performed; and
- Authorizing or receiving compensation for hours not worked.

13.3 The School requires its employees, officers, trustees, supervisors and members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the School, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. The School will neither engage in nor tolerate unlawful or unethical behavior with regard to any of its policies, practices or operations.

13.4 It is illegal and against the School's policy to destroy any corporate audit record that may be subject to or related to an investigation by the School or any federal, state or regulatory body.

COMPLAINT AND GRIEVANCE PROCEDURE

14.1 The School recognizes the right of all employees and members of the School community to express grievances and to seek resolution. This section outlines the normal procedures and reporting lines for Grievances or Complaints. The School recognizes the potential difficulties in voicing grievances. In all cases, please speak with whichever person you feel the most comfortable, whatever your reasons.

14.2 For employees, members of the School at any level, or other non-employee affiliates (as described in the INTRODUCTION and **Sections 2.1 and 2.5**, above): if you believe that you or anyone else may have been discriminated against, harassed by or retaliated against or subject to any inappropriate conduct prohibited by this policy (even if not unlawful), if you believe that someone has engaged in improper or unethical behavior prohibited by this policy, or if you believe that someone unjustly denied a request for a reasonable accommodation by any executive, manager, supervisor, co-worker or non-employee in violation of this policy, you should report your concerns immediately either to your supervisor, the Chair of the Managing Committee in the U.S. (for employees or others in the US), the Director of the School in Athens (for employees, members, or others in Greece), or the Board President depending on the circumstances of the complaint.

14.3 If you have any question as to whether certain conduct is prohibited by this policy, or whether an accommodation may be needed or possible, you are encouraged to speak with any of the individuals identified above.

14.4 Students at any academic level or researchers (regardless of academic affiliation or status), who are connected with an Affiliated Project or other research program involving the School, who wish to bring a grievance should consider the director of the Affiliated Project or the faculty member responsible for the program to be the immediate supervisor. The stated grievance procedure of any Affiliated Project should be followed, whenever possible; but any complainant may follow the ASCSA procedures described here. In most cases, that would mean reporting any unresolved concerns to the Director of the School in Athens. Grievances involving Affiliated Projects or research programs, but occurring outside Greece, should be resolved by the appropriate authorities at the home institution.

14.5 In all cases, *if you feel comfortable doing so*, you are encouraged (but not required) to speak directly with the individual who has engaged in conduct which you believe is in violation of this policy and to notify that individual that such conduct is unwelcome. If you are uncomfortable with speaking directly to the individual, you should report your concerns immediately using the complaint procedure described above. In all cases, your concerns will be investigated promptly, thoroughly and impartially.

14.6 Anyone filing a complaint concerning a violation or suspected violation must act in good faith in believing the information disclosed indicates a violation. Any allegation that proves to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

14.7 On Confidentiality and Anonymity: The existence and nature of complaints, including the identity of any complainant, witness or accused, will be disclosed only to the extent necessary to make a prompt, impartial and thorough investigation or as may be necessary to take appropriate corrective measures. While anonymity may be necessary to protect a complainant or witness from later retaliation, the person(s) named in any grievance must be informed of any allegations and must have the opportunity to respond. Retaliation of any kind, at any future date, is strictly prohibited and will result in disciplinary action regardless of the person's affiliation with the School at the time of the retaliation.

14.8 Anyone receiving a complaint from an employee or non-employee affiliate of unlawful discrimination, harassment, retaliation, refusal of accommodation, or other inappropriate conduct of the nature described in this policy, whether from within the School or from an Affiliated Project, must report the complaint immediately to the Director of the School, the Chair of the Managing Committee, or the President of the Board of Trustees as described above. While the resolution of a complaint might not involve these individuals, such reporting is necessary for the School to maintain a confidential record of grievances and their resolutions.

14.9 The individual receiving a grievance report may attempt to resolve the situation through discussion with the parties involved.

14.10 All employees and non-employee affiliates – whether complainant, accused or witness – are expected to cooperate fully and honestly in any investigation of a violation of this policy.

Appeal Procedure

14.11 If the grievance cannot be resolved by such consultation as described above, the Chair of the Managing Committee or the President of the Board of Trustees may appoint an *ad hoc* appeal committee comprising no fewer than three members of the Managing Committee or the Trustees respectively.

14.12 Your appeal should be in writing to help ensure that it is clear that you wish to appeal. While we encourage you to be detailed, it is sufficient to say “I wish to appeal my concern.”

Sanctions for Violations

14.13 Decisions and actions by the School in response to grievances do not replace or infringe upon decisions made by other institutions (universities, granting agencies, and so on) that may also be involved.

14.14 Any supervisor, other employee or non-employee affiliate who, after appropriate investigation, has been found to have engaged in unlawful discrimination, harassment or retaliation and/or inappropriate or unethical conduct inconsistent with this policy (even if not unlawful) will be subject to appropriate (immediate and proportionate) corrective action, up to and including termination of the employment or other affiliation with the School.

14.15 Any supervisor who fails to make an immediate report of a complaint or concern raised to them as required by this policy will be subject to appropriate (immediate and proportionate) corrective action, up to and including termination of the supervisor’s employment with the School.

14.16 As a reminder, conduct does not need to violate the law to violate this policy. At the same time, not every behavior that may be considered offensive to someone violates this policy.

14.17 Exempt and non-exempt employees who violate this policy also may be suspended without pay. Exempt employees will be suspended without pay in full day increments only.

Retaliation Prohibited

14.18 The School will neither engage in nor tolerate unlawful retaliation of any kind, at any time, against any person who makes a complaint of a violation of this policy, serves as a witness or otherwise participates in the investigatory process. As with all other provisions of this policy, all employees and non-employee affiliates are protected by this provision as well as restricted in terms of what they do.

14.19 Retaliation is a serious violation of the School's Whistle Blower Policy (See "Whistle Blower Policy," adopted January 4, 2008, and available here <https://www.ascsa.edu.gr/about/governance/managing-committee-documents>) and employees who feel they have been subjected to any acts of retaliation should immediately report such conduct to the Director of the School, the Chair of the Managing Committee, or the President of the Board of Trustees.

14.20 Prohibited retaliation includes adverse tangible employment actions, such as denial of a raise or promotion, other material changes in the terms and conditions of employment, or adverse actions independent of the workplace of the School, such as excluding a complainant from a future employment, research, or fellowship opportunity.

14.21 It is no defense to retaliation by any person (officer, member, supervisor, etc.) that the complaint did not have legal merit. So long as an individual acts in good faith in making a complaint, no adverse action may be taken against the complainant for having made the complaint, served as a witness or otherwise participated in the investigatory process.

14.22 Prohibited retaliation will be handled under this policy in the same manner and subject to disciplinary/corrective action to the same degree as any other violation of this policy.