

BILTMORE BEACH CLUB EQUAL EMPLOYMENT OPPORTUNITY, ANTI-DISCRIMINATION AND ANTI-HARASSMENT POLICY

Equal Employment Opportunity

The Biltmore Beach Club adheres to a policy of equal opportunity employment. Employees and applicants for employment will not be discriminated against on the basis of race, color, religion, age, gender, national origin, sexual orientation, gender identity characteristics or expression, citizenship status, marital status, disability, veteran status, domestic violence status or any other legally protected status, in any employment decisions, including, but not limited to, recruitment, hiring, compensation, training, apprenticeship, promotion, demotion, transfer, layoff, termination, and any other term and condition of employment. All employment-related decisions are based solely on relevant criteria, including training, experience, education, qualifications, abilities, and suitability.

The Biltmore Beach Club is committed to administering all employment-related matters in accordance with the Company's policy of equal opportunity.

Anti-Discrimination and Anti-Harassment

The Biltmore Beach Club is committed to providing and maintaining a work environment free from all forms of harassment and discrimination.

Definitions:

- (a) "Discrimination" includes conduct or comments directed towards any individual(s) based on that individual's race, color, religion, age, gender, national origin, sexual orientation, gender identity characteristics or expression, citizenship status, marital status, disability, veteran status or any other status protected by law or regulation, that affects or impacts a term or condition of that individual's employment.
- (b) "Sexual harassment" is a form of discrimination and is specifically prohibited under The Biltmore Beach Club policies. The Equal Employment Opportunity Commission (EEOC) has established guidelines particularly for sexual harassment, as a form of sexual discrimination under Title VII of the Civil Rights Act. Sexual harassment includes:
 - submission to unwelcome sexual advances and other physical or verbal conduct that is made a term or condition of an individual's employment, such as demanding that an employee have a sexual relationship with a manager in order for the employee to keep his/her job.
 - conduct that interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment, such as telling offensive jokes and engaging in offensive behavior in the workplace.
- (c) "Harassment" on the basis of any other protected characteristic is also a form of discrimination, and includes verbal or physical conduct that denigrates or shows hostility toward another because of his or her race, color, religion, age, gender, national origin, sexual orientation, gender identity characteristics or expression, citizenship status, marital status, disability, veteran status, or any other characteristic protected by law or regulation.

Complaint Procedure

Any employee who suspects, observes, or experiences discriminatory or harassing actions by another Biltmore Beach Club employee, member of management or anyone else should immediately notify his/her manager, employment committee chairperson or any Director of the Biltmore Beach Club whether the employee is the victim or not, whether the offender is a manager, member, coworker, vendor, or visitor, and regardless of the sex of the offender.

The Biltmore Beach Club will promptly investigate and appropriately address the situation, and employees can be confident that they may raise concerns without fear of reprisal. Anyone found to be engaging in any type of discriminatory behavior will be subject to disciplinary action, up to and including termination of employment.

Retaliation

Neither The Biltmore Beach Club nor its management will in any way retaliate against an individual who raises a good faith complaint alleging harassment or discrimination, or cooperates in any investigation. Retaliation is a serious violation of policy and will subject any employee who engages in retaliatory behavior to the same strict discipline as the harasser.

To the extent practical and appropriate, complaints of harassment or discrimination and the subsequent investigations will be treated as discreetly as possible. All investigations will be promptly handled, and are designed to protect the privacy of, and minimize suspicion toward, all parties concerned. Employee cooperation in investigations is viewed as a condition of employment. Refusal or failure to cooperate with any aspect of this policy may result in disciplinary action, up to and including termination of employment.

Allegations that are substantiated will result in appropriate disciplinary actions against the harasser, up to and including termination. Likewise, false accusations may result in appropriate disciplinary action.

Americans with Disabilities Act Policy

The Biltmore Beach Club abides by the requirements of the Americans with Disabilities Act and their state and local counterparts governing employment of individuals with disabilities. The Biltmore Beach Club will make reasonable accommodations for qualified individuals with known disabilities, unless doing so results in an undue hardship to the Company. This policy applies to all aspects of employment, including job selection, job assignment, compensation, discipline, termination, and access to benefits and training.