

River Palms Riverfront Condominium Association, Inc.

Anti-Harassment and Complaint Procedure Policy

1. Purpose and Scope

The River Palms Riverfront Condominium Association, Inc. (the "Association") is committed to a community in which everyone is treated with dignity and respect. The Association will not tolerate unlawful discrimination, harassment or retaliation, and will enforce this policy to prevent and correct such conduct.

This policy applies to the Association's directors, officers, committee members and employees; management company personnel; unit owners, tenants and other occupants; and vendors, contractors, guests and invitees (collectively, "Covered Persons"). It covers conduct on the condominium property, at Association meetings and functions, and in communications relating to the Association, including e-mail, text messages and social media.

2. Prohibited Conduct

2.1 Discrimination. No Covered Person may discriminate against any person in Association services, facilities, benefits, employment, or the application of the governing documents, rules and approval processes, because of race, color, national origin, religion, sex, familial status, disability, age, gender identity, sexual orientation, genetic information, marital status or any other status protected by law (each, a "Protected Characteristic"). Discrimination includes refusing a reasonable accommodation or modification that a person with a disability needs to use and enjoy a dwelling. Accommodation requests, including requests for assistance animals, will be handled under Section 760.27, Florida Statutes, and other applicable law.

2.2 Harassment. Harassment is unwelcome verbal, written, electronic, nonverbal or physical conduct that (a) threatens, intimidates or coerces a Covered Person or interferes with the use and enjoyment of a unit or the common elements, or (b) is directed at a person because of a Protected Characteristic and is severe or pervasive enough to create an intimidating, hostile or offensive environment. Intent is not required. Examples include:

- slurs, epithets, negative stereotyping, or offensive comments, images or written material about a Protected Characteristic;
- threats of violence or property damage, stalking, or repeated unwanted contact after a request to stop; and
- interfering with any person's exercise of fair housing rights.

2.3 Sexual Harassment. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal or physical conduct of a sexual nature, such as suggestive comments or jokes, sexual propositions, repeated unwelcome requests for dates, sexually explicit images or messages, leering, obscene gestures, and unwanted touching. It also

includes conditioning any Association action, approval, service or benefit on submission to such conduct. Conduct that may be criminal should also be reported to law enforcement.

2.4 Retaliation. No person may retaliate against anyone for making a good faith complaint, participating in an investigation, serving as an investigator, or requesting a reasonable accommodation. Retaliation is a separate violation of this policy. A complaint found to be knowingly false and made in bad faith may also result in action under this policy.

2.5 What This Policy Does Not Cover. Courteous, welcome interactions between Covered Persons are not harassment. This policy will not be applied to restrict speech or conduct protected by law, including an owner's right to speak at and record meetings under Section 718.112(2)(c), Florida Statutes, to assemble and communicate with other owners under Section 718.123, Florida Statutes, to criticize the Board or management, or to petition any governmental entity. Civil disagreement about Association business, even when forcefully expressed, is not harassment.

3. Reporting a Complaint

1. If there is a threat of imminent violence or other criminal conduct, call 911 first, then notify the Association.
2. Submit complaints to the Community Association Manager. If the complaint involves the Manager or management staff, submit it to the President; if it involves the President, submit it to any other officer or director. Anyone who receives a complaint shall promptly forward it to the appropriate person and to Association counsel.
3. Complaints should be made as soon as possible and, preferably, in writing, describing what happened, who was involved, when and where it occurred, and any witnesses or documents. The Association will act on verbal complaints as well, and the person receiving one shall put it in writing.

4. Investigation

1. Within five (5) business days, the Association will acknowledge the complaint, confirm that retaliation is prohibited, and take any interim measures reasonably needed to protect the complainant.
2. The Board will appoint an impartial investigator, who may be an uninvolved director or officer, the Manager, Association counsel or an outside investigator. No party, witness or person closely associated with a party may serve.
3. The person accused will be told the substance of the allegations and given a fair opportunity to respond. Covered Persons are expected to cooperate.

4. The investigator will provide written findings and recommendations to the Board, ordinarily within thirty (30) days. Board action will comply with Chapter 718, Florida Statutes, including its open meeting requirements, except where a meeting may be closed under Section 718.112(2)(c).
5. The complainant and the person accused will be informed in writing of the outcome, to the extent appropriate.

5. Confidentiality and Records

Complaints and investigations will be kept confidential to the extent reasonably possible and permitted by law, and information will be shared only on a need-to-know basis. The complainant's identity may need to be disclosed during the investigation. Records will be kept in secure files in the Management Office and made available for inspection only as required by Section 718.111(12), Florida Statutes.

6. Remedies

If a violation is found, the Association will take action reasonably within its authority to stop the conduct and prevent its recurrence, based on the severity and frequency of the conduct and any prior violations. Remedies include:

Employees: written reprimand, mandatory training, probation, demotion or reassignment, or termination. A written apology may be required, but only together with another remedy.

Management company personnel, vendors and contractors: required removal of the individual from River Palms assignments, exclusion from the property, and suspension or termination of the contract under its terms.

Directors, officers and committee members: removal from officer or committee positions to the extent permitted by the Bylaws and recusal from matters involving the complainant, in addition to the remedies below. Directors are subject to recall under Section 718.112(2)(j), Florida Statutes.

Owners, tenants, occupants, guests and invitees: written warning; fines and suspension of common element use rights in accordance with Section 718.303, Florida Statutes, and the Declaration, including their notice and hearing requirements; exclusion of guests; remedies regarding tenants under the Declaration; injunctive relief; and referral to law enforcement. Owners are responsible for the conduct of their tenants, occupants, guests and invitees.

7. Other Rights

Nothing in this policy prevents any person from pursuing legal remedies or filing a complaint with the U.S. Department of Housing and Urban Development, the Florida Commission on Human

Relations, the U.S. Equal Employment Opportunity Commission or the courts. This policy is intended to comply with applicable law, including the federal and Florida Fair Housing Acts and the Florida Civil Rights Act. To the extent it prohibits conduct the law does not, it states a community standard adopted by the Board and creates no private cause of action.

8. Distribution and Amendment

This policy will be provided to all directors, officers, committee members, employees and the management company, and made available to owners and residents with the Association's other rules and policies. The Board may amend this policy at any time.

Adopted by the Board of Directors of River Palms Riverfront Condominium Association, Inc. at a duly noticed meeting held on the 16th day of September, 2026.

Signed by:

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Signature

Brenda Furbush

Print Name and Title President