

**POLICY: EQUAL EMPLOYMENT OPPORTUNITY,
ANTI-HARASSMENT, AND
NON-DISCRIMINATION POLICY**
SCOPE: ALL STAFF

Policy Number: 4.1
Page 1 of 4
Date Issued/Approved: 7/2009; 12/2015; 12/2019;
12/2021

1. **Policy:** It is the policy and practice of CCLF to provide and promote equal employment opportunities for all applicants and employees. CCLF is firmly committed to maintaining a workplace based on our collective values which stress the quality of our products and services, the importance of teamwork, and the need for all employees to treat each other with dignity, fairness, and respect. Therefore, it is the responsibility of all employees to ensure that the concepts of equal employment opportunity, non-harassment, and non-discrimination are understood, abided by, and carried out by everyone.

Prohibition On Discrimination And Harassment: It is CCLF's policy to hire, train, promote, compensate, and administer all employment practices without regard to race, color, ancestry, ethnic group, age, sex, religion, national origin, handicap or disability (including associating with a person with a disability), marital status, veteran status, affectional/sexual orientation, gender identity or expression, personal appearance, genetic information, political affiliation, familial status, or on account of membership in any protected category under federal, state, or local laws. Harassment of employees or applicants because they are members or affiliated with members of any of the foregoing protected groups is also prohibited and will not be tolerated. CCLF will take appropriate measures in response to any such incidents which are reported. Every good faith effort will be taken by the Company to fulfill the objectives of this policy.

The Company believes that every employee has the right to work in an environment totally free of harassment and discriminatory conduct, joking, or epithets. Such behavior does not advance the purposes of our Company; it is also morally wrong, and may subject the Company to legal exposure in certain circumstances. Toward that end, the Company's policy sets a standard of conduct that is higher than what federal, state, and local laws may require, as it forbids discriminatory or harassing conduct of the kind described in this policy even if the conduct does not rise to the level of a violation of applicable law. Consequently, any employee who engages in these types of prohibited conduct will be subject to disciplinary action, up to and including termination.

Conduct Constituting Prohibited Sexual Or Discriminatory Harassment: Sexual harassment is one of the forms of harassment forbidden by this policy. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender-related identity and the status of being transgender. The Company prohibits certain sex-related conduct regardless of whether it amounts to unlawful sexual harassment, as such conduct is deemed to be inconsistent with the Company's policy of promoting tolerance, respect, and dignity in the workplace. For purposes of this policy, sexual harassment is defined as unwelcome or unwanted sexual advances, requests for sexual favors, and/or any other verbal or physical conduct of a sexual nature when (1) submission to such conduct is either explicitly or implicitly made a term or condition of an individual's employment; or (2) submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual; or (3) such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

Examples of sexual harassment or discrimination include but are not limited to:

- Unwanted and unwelcome sexual pressure, attention, invitation, requests or advances;
- Demands for sexual favors in exchange for employment benefits, including conditioning a benefit such as a certain salary or promotion on the granting of sexual favors or the establishment or continuance of a personal relationship, or implying to an employee that an award of such a benefit is conditioned upon the granting of sexual favors or the establishment or continuance of a personal relationship;
- Leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons or posters;
- Sexual propositions, jokes, flirtations, innuendo, or discussions of sexual activity or inappropriate discussion about an employee's sexual orientation or gender identity (whether in conversation or through electronic or other means);
- Verbal abuse of a sexual nature, including but not limited to graphic verbal commentaries about an individual's body and sexually degrading words used to describe an individual;
- Inappropriate touching or other physical contact, including but not limited to patting, pinching or brushing against another's body, as well as sexual assault or rape;
- Sex stereotyping, whereby conduct or personality traits are considered inappropriate or lead to adverse treatment because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look;
- Stating or implying that another employee's performance is attributable in whole or in part to the employee's sex or membership in any protected-group categories under federal, state, or local laws;
- Stating or implying that a fellow employee's promotion in the corporate hierarchy has resulted from the granting of a sexual favor or relationship;
- A tangible employment decision made because of an individual's compliance with or failure to comply with sexual demands.

As an employee of the Company, you should be aware that the issue of whether behavior constitutes harassment or discriminatory conduct might depend on how that behavior is viewed by the employee who is subjected to the behavior. Any employee who initiates or persists in such prohibited behavior assumes the risk of violating this policy in the event that the person who is the object of the behavior views it as offensive; accordingly, such an employee may be subject to discipline even if his or her conduct might not have been intended as offensive.

Conduct Constituting Sexual Or Discriminatory Conduct, Joking, Or Epithets: For example, and without compiling an exhaustive list, the following are illustrative of conduct that the Company condemns and prohibits under this policy:

- (a) It is prohibited for any employee to bring any item to the work premises for purposes of an offensive sexual or discriminatory joke or epithet;
- (b) It is also prohibited for any employee to use Company property, bulletin boards, documents, or e-mail or voice mail systems for purposes of an offensive sexual or discriminatory joke or epithet;

- (c) It is also prohibited for any employee to deface Company property or the personal property of anyone else for purposes of an offensive sexual or discriminatory joke or epithet;
- (d) It is also prohibited for any employee to utter or utilize any offensive sexual or discriminatory jokes or epithets at work, or when referring to or about any other person, be they an employee or a non-employee;
- (e) It is also prohibited for any employee to harass anyone else due to their sex, sexual orientation, race, color, ethnic background, age, national origin, religion, marital status, disability, or other protected-group status; and,
- (f) It is also prohibited for any employee to bring to or display in the workplace any materials having an offensive content (such as pornography or due to a demeaning reference to another's protected-group status), or to circulate or disseminate any such materials through the Company's internal mail or e-mail systems.

Other Harassment Defined. For purposes of this policy, other harassment is defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of their race, color, gender, age, religion, national origin, sexual orientation, disability, veteran status or any other characteristic protected by law, and that: creates an intimidating, hostile or offensive work environment; or unreasonably interferes with an individual's work performance.

For example, and without compiling an exhaustive list, the following are illustrative of conduct that the Company condemns and prohibits as examples of "other harassment":

- using epithets or slurs;
- mocking, ridiculing or mimicking another's culture, accent, appearance or customs;
- threatening, intimidating or engaging in hostile or offensive acts that focus on any characteristic protected by law, including jokes or pranks;
- calling employees by terms of endearment;
- using vulgar, kidding or demeaning language;
- the displaying on walls, bulletin boards or elsewhere on CCLF premises, or circulating in the workplace, of written or graphic material that denigrates or shows hostility or aversion toward a person or group because of any characteristic protected by law.

CCLF embraces and encourages employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique. Employees are encouraged to actively monitor their behavior and to always communicate with thoughtfulness and respect.

Application Of The Policy To Non-Company Employees: The Company's policy also applies to the dealings of any employee with non-employees such as clients, customers, vendors, and members of the public. Furthermore, the policy also applies to individuals who do business with the Company, who are present on the Company's premises, or who interact with any employee of the Company while the employee is conducting company business. The Company prohibits and does not tolerate discrimination or harassment of its employees, whether engaged in towards or by our employees, directors, officers, customers, vendors, suppliers, contractors, subcontractors, consultants, other persons performing work pursuant to a contract, visitors or any non-employees who conduct business or interact with us.

Procedure Upon Occurrence Of Prohibited Conduct: Employees who believe they have been subjected or exposed to discrimination or harassment prohibited by this policy have the right to have any such activity terminated immediately. Every employee has a role in preventing discrimination and harassment. Every employee must avoid any conduct that reasonably could be interpreted as discrimination or harassment under this policy, and every employee should indicate when another person's conduct in the workplace is unwelcome. Employees who feel they are being subjected to inappropriate behavior prohibited by this policy are encouraged to ask the offender to stop engaging in the objectionable behavior, as this is sometimes effective in putting a stop to such behavior. In addition (or instead of speaking directly with the offender, if such informal requests are ineffective or impractical under the circumstances or if the employee does not feel comfortable speaking directly with the offender) the employee must promptly contact the individuals identified in the "Reporting Procedures" section below immediately and discuss the complaint or concern.

In addition, every employee should endeavor to protect other employees from discrimination, harassment and other behavior covered by this policy. Employees are expected and encouraged to inform others in the workplace whenever their conduct is unwelcome, offensive, inappropriate, or in poor taste. Therefore, employees are required to come forward promptly and report any problems pursuant to this policy before the alleged offending behavior becomes severe or pervasive. Any employee who observes or has reason to believe that another employee or any non-employee who conducts business with or interacts with the Company has been or is being harassed or otherwise treated in a manner inconsistent with this policy, or simply has questions or concerns about what constitutes harassing or other inappropriate behavior under this policy, should promptly report such questions or concerns in accordance with the complaint reporting procedure. In addition, employees should come forward with complaints about alleged problems or violations of the Company's policy at any time. Complaints need not be limited to someone who was the target of the alleged offending conduct. Anyone who has observed an alleged violation of the policy is also encouraged to report it to the Company. Prompt reporting can help us to respond quickly and prevent the behavior from escalating and also help us to take corrective action to minimize the harm to individuals and to minimize the disruption to our working environment.

Reporting Procedures: If an employee experiences or witnesses any conduct that they believe is inconsistent with this policy, the Company expects the employee to notify immediately one or more of the people designated below. The Company has convenient and reliable mechanisms in place for reporting alleged violations of the policy. Complaints will be accepted in writing or orally. Complaints can be directed to multiple persons within the Company, including

- An employee's supervisor;
- Any member of the HR staff;
- Any member of the HR Committee;
- Any member of management;
- Board Chair; or
- Assistant Secretary, Lisa Herrera

All complaints shall be treated in a confidential manner to the extent possible. Upon receipt of a complaint or in circumstances where the Company becomes aware of alleged offending conduct, the Manager or other member of management who is made aware of the complaint

must notify Human Resources immediately so that a member of the HR staff can complete a prompt, thorough, and impartial investigation of the alleged offending conduct. If the investigation leads to a determination that an individual engaged in conduct in violation of the Company's policy, appropriate corrective action will be taken immediately, including the possible termination of the offending party. In investigating complaints under this policy, the Company may impose discipline for inappropriate conduct that comes to the Company's attention, without regard to whether the conduct constitutes a violation of law.

Prohibition On Retaliation: The Company will not tolerate adverse treatment of any employee because he or she reports harassment or discrimination, or provides information related to such complaints. As this policy strictly prohibits retaliation of any form against anyone who complains of alleged violations of this policy, the prohibition against retaliation also applies to any employee involved in or cooperating with any investigation of alleged offending conduct under this policy. Thus, a supervisor is prohibited from making any personnel decision or taking any other adverse action against any employee because the employee complained or cooperated in good faith with an investigation of alleged conduct prohibited by this policy. Any acts of retaliation will be considered a violation of this policy, and corrective action will be taken immediately, including the possible termination of any individual who engages in retaliation of any form.

Acknowledgment Of Receipt And Understanding Of The Company's Equal Employment Opportunity, Anti-Harassment, And Non-Discrimination Policy: All employees are required to sign an acknowledgment that they received and understand CCLF's Equal Employment Opportunity, Anti-Harassment, And Non-Discrimination Policy.

