



**INCLUSIVE**  
PROSPERITY CAPITAL™

# ANTI-DISCRIMINATION & ANTI-HARASSMENT POLICY

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# INCLUSIVE PROSPERITY CAPITAL™

Policy Summary	
<b>Policy Name:</b>	<b>ANTI-DISCRIMINATION AND ANTI-HARASSMENT POLICY</b>
<b>Owner:</b>	<b>Carmen Carson</b>
<b>Versions:</b>	<b>October 9, 2023 (v.1)</b>
<b>Related Policies:</b>	<ul style="list-style-type: none"><li>• Anti-Retaliation Policy</li></ul>

## **Article I**

### **All Harassment and Discrimination Prohibited**

Inclusive Prosperity Capital, Inc. (**IPC**) believes in the fair and equitable treatment of the individual. We are committed to equal opportunity, which includes providing a workplace that is free from harassment and discrimination. IPC's designated civil rights coordinator is the Chief People and Culture Officer or any successor to such position who serves as head of the Human Resources. IPC strictly prohibits and does not tolerate harassment or discrimination against employees and covered persons (that is, interns, volunteers, applicants, or independent contractors), by coworkers, supervisors, managers, or third parties on the basis of a person's:

- Race, including traits associated with race, such as:
  - hair texture; and
  - protective hairstyles, including braids, locks, and twists.
- Religious creed, including:
  - religious belief, observance, and practice; and
  - dress or grooming practices.
- Color.
- National origin, including the individual's or ancestors' actual or perceived:
  - English language proficiency;
  - physical, cultural, or linguistic characteristics associated with a national origin group;
  - marriage to or association with persons of a national origin group;
  - tribal affiliation;

- membership in or association with an organization identified with or seeking to promote the interests of a national origin group;
- attendance or participation in schools, churches, temples, mosques, or other religious institutions generally used by persons of a national origin group; and
- name that is associated with a national origin group.

National origin groups include, but are not limited to, ethnic groups, geographic places of origin, and countries that are not presently in existence.

- Ancestry.
- Physical disability.
- Mental disability.
- Reproductive health decision making, including a decision to use or access a particular drug, device, product, or medical service for reproductive health.
- Medical condition, including:
  - any cancer-related physical or mental health impairment from a diagnosis, record, or history of cancer; or
  - a genetic characteristic.
- Genetic information, including information about:
  - an individual's genetic tests;
  - family members' genetic tests;
  - family members' diseases or disorders;
  - an individual's or family member's receipt of, or request for, genetic services; and
  - participation by an individual or their family member in clinical research that includes genetic services.
- Marital status.
- Sex, including:
  - pregnancy;
  - childbirth;
  - breast feeding; or
  - medical condition related to pregnancy, childbirth, or breast feeding.
- Gender.
- Gender identity, meaning a person's internal understanding of their gender, or the perception of a person's gender identity, which may include male, female, a combination of male and female, neither male or female, a gender different from the person's sex assigned at birth, or transgender.

- Gender expression, meaning a person’s gender-related appearance or behavior, or the perception of such appearance or behavior, whether or not stereotypically associated with the person's sex at birth.
- Age (e.g., 40 or older).
- Sexual orientation, including:
  - heterosexuality;
  - homosexuality; and
  - bisexuality.
- Military or veteran status, including past, current, or prospective service in the uniformed services.
- Any other protected classes or characteristic protected under applicable federal, state, or local law.

IPC also prohibits and does not tolerate harassment or discrimination against employees and covered persons who are perceived to have any of these characteristics or who associate with a person who has, or is perceived to have, any of these characteristics. Harassment and discrimination can occur in the workplace, after hours, or on social media. It should always be reported and will not be tolerated by IPC.

**Article II**  
**Sexual Harassment**

All IPC employees, other workers, and representatives (including vendors, customers, subscribers, clients and visitors) are prohibited from harassing employees and other covered persons based on that individual's sex (including that individual's pregnancy, childbirth, breast feeding, or medical conditions relating to pregnancy, childbirth or breast feeding), sexual orientation, or gender (including that individual's gender identity and gender expression) and regardless of the harasser's sex or gender. Sexual harassment is illegal and also against IPC's policy.

Sexual harassment means any harassment based on someone's sex, sexual orientation, or gender, as described in this policy. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature, when any of the following is true:

- Submission to the advance, request, or conduct is made either explicitly or implicitly a term or condition of employment.
- Submission to or rejection of the advance, request, or conduct is used as a basis for employment decisions.
- Such advances, requests, or conduct have the purpose or effect of substantially or unreasonably interfering with an employee's work performance by creating an intimidating, hostile, or offensive work environment.

IPC will not tolerate any form of sexual harassment, regardless of whether it is:

- Verbal (for example, epithets, derogatory statements, slurs, sexually-related comments or jokes, unwelcome sexual advances, or requests for sexual favors).

- Physical (for example, assault, inappropriate physical contact, or impeding or blocking movements).
- Visual (for example, displaying sexually suggestive posters, cartoons, or drawings, sending inappropriate adult-themed gifts, leering, or making sexual gestures).
- Online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.).

This list is illustrative only and not exhaustive. No form of sexual harassment will be tolerated.

Harassment can occur in the workplace, after hours, or on social media. It should always be reported and will not be tolerated by IPC.

### **Article III** **Other Types of Harassment**

IPC's anti-harassment policy applies equally to other harassment based on an employee's race, color, religious creed, religious belief, observance, or practice, national origin, ancestry, age (40 and over), marital status, genetic information, medical condition, mental disability, physical disability, reproductive health decision making, or military or veteran status (as described earlier in this policy), as well as, any other protected classes or characteristics protected under applicable federal, state, or local law.

Such harassment often takes a similar form to sexual harassment and includes harassment that is:

- Verbal (for example, epithets, derogatory statements, slurs, derogatory comments, or jokes).
- Physical (for example, assault or inappropriate physical contact).
- Visual (for example, displaying derogatory posters, cartoons, drawings, or making derogatory gestures).
- Online (for example, derogatory statements or postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.)

This list is illustrative only and not exhaustive. No form of harassment will be tolerated.

Harassment is prohibited both at the workplace and at employer-sponsored events.

### **Article III** **Supervisor Responsibilities**

Supervisors and managers have an obligation to report sexual or other harassment, discrimination, or retaliation of which they become aware. Supervisors and managers who observe such conduct or who receive any complaints of misconduct must report the conduct or complaint to Human Resources so that an investigation can be made and corrective action taken, if appropriate.

### **Article IV** **Complaint Procedure:**

#### **A. Internal**

If you are subjected to any conduct that you believe violates this policy or witness any such conduct, you must promptly report the conduct, either orally or in writing. You may speak to, write, or contact any of the following resources at IPC:

- Your direct supervisor or, if the conduct involves your direct supervisor, Human Resources.
- Human Resources
- The Legal Department.
- The IPC Ethics Hotline by calling 1-877-647-3335, going online to the IPC website “Raising a Concern” page or directly to [www.redflagreporting.com](http://www.redflagreporting.com), or texting RFR to 234-231-9005. Note that “Inclusive” is the IPC client code to provide to the IPC Ethics Hotline.

Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses.

IPC will ensure that a fair, timely, and thorough investigation is conducted by qualified personnel in an impartial manner that provides all parties with appropriate due process and reaches reasonable conclusions based on the evidence collected. IPC will maintain appropriate documentation and tracking to ensure reasonable progress is made. At the close of the investigation, IPC will consider appropriate options for remedial actions and resolutions. If misconduct is found, IPC shall take prompt, corrective action, as appropriate. IPC will maintain confidentiality to the extent possible.

IPC is committed to enforcing this Anti-Discrimination and Anti-Harassment Policy. The effectiveness of our efforts depends in part on employees telling us about inappropriate workplace conduct. If you feel that you or someone else may have been subjected to conduct that violates this policy, you should report it immediately. If employees do not report harassing or discriminatory conduct, IPC may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

#### B. External

Additionally, if you are subjected to any conduct that you believe violates this policy, you may file a complaint by contacting the:

- Equal Employment Opportunity Commission (**EEOC**) at 800-669-4000 or visiting <https://www.eeoc.gov/contact-eeoc/>.

If you wish to pursue filing with the EEOC you should contact them directly to obtain further information about their processes and time limits.

### **Article V** **No Retaliation**

No one will be subject to, and IPC prohibits, any form of discipline, reprisal, intimidation, or retaliation for good faith reporting of incidents of harassment or discrimination of any kind, pursuing any harassment or discrimination claim, or cooperating in related investigations.

### **Article V** **Violations of This Policy**

If Human Resources working with the Legal Department determines any employee, regardless of position or title, has subjected an individual to harassment, discrimination, or retaliation in violation of this policy, they will be subject to discipline, up to and including termination of employment.

#### **Article VI**

##### **Administration of This Policy**

Human Resources is responsible for the administration of this policy. If you have any questions regarding this policy or questions about harassment, discrimination, and retaliation that are not addressed in this policy, please contact Human Resources.

#### **Article VII**

##### **Conduct Not Prohibited by This Policy**

This policy is not intended to preclude or dissuade employees from engaging in activities protected by state or federal law, including the National Labor Relations Act, such as discussing wages, benefits, or terms and conditions of employment, forming, joining, or supporting labor unions, bargaining collectively through representatives of their choosing, raising complaints about working conditions for their and their fellow employees' mutual aid or protection, or legally required activities.