



**INCLUSIVE**  
PROSPERITY CAPITAL™

# EQUAL EMPLOYMENT OPPORTUNITY POLICY

[INCLUSIVEPROSPERITYCAPITAL.ORG](http://INCLUSIVEPROSPERITYCAPITAL.ORG)



# INCLUSIVE PROSPERITY CAPITAL™

Policy Summary	
<b>Policy Name:</b>	<b>EQUAL EMPLOYMENT OPPORTUNITY 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-Discrimination and Anti-Harassment Policy</li><li>• Anti-Retaliation Policy</li><li>• Parental Leave Policy</li></ul>

## Article I

### Equal Opportunity Employer

Inclusive Prosperity Capital, Inc. (**IPC**) is an equal opportunity employer and complies with all applicable federal, state, and local fair employment practices laws. IPC strictly prohibits discrimination and harassment of any type and affords equal employment opportunities to employees, applicants, any other covered persons without regard to race, color, religion, creed, national origin or ancestry, ethnicity, sex (including gender, pregnancy, sexual orientation, and gender identity), age, physical or mental disability, citizenship, past, current, or prospective service in the uniformed services, genetic information, other protected classes recognized by applicable state or local law, or any other characteristic protected under applicable federal, state, or local law.

All IPC employees, other workers, and representatives are prohibited from engaging in unlawful discrimination and harassment. This policy of equal employment opportunity (**EEO**) and anti-discrimination applies to all terms and conditions of employment, including, but not limited to, hiring, training, promotion, discipline, compensation, benefits, and termination of employment.

The policies and principles of EEO also apply to the selection and treatment of independent contractors, personnel working on our premises who are employed by temporary agencies and any other persons or firms doing business for or with IPC.

IPC complies with the Americans with Disabilities Act (**ADA**), as amended by the ADA Amendments Act, and all applicable state or local law. Consistent with those requirements, IPC will reasonably accommodate qualified individuals with a disability if such accommodation would allow the individual to perform the essential functions of the job, unless doing so would create an undue hardship. If you believe you need an accommodation, contact Human Resources.

IPC will also, where appropriate, provide reasonable accommodations for an employee's religious beliefs or practices.

IPC complies with the Pregnant Workers Fairness Act (**PWFA**) and all applicable state or local law. IPC will provide reasonable accommodations to qualified job applicants and employees to accommodate the individual's known limitations related to pregnancy, childbirth, or related medical conditions, unless doing so would create an undue hardship. IPC will not require a qualified employee to take paid or unpaid leave if another reasonable accommodation can be provided. If you believe you need a pregnancy-related accommodation, contact Human Resources and please make a request under IPC's Parental Leave Policy.

## **Article II**

### **Complaint Procedure**

IPC encourages employees to report all incidents of discrimination and harassment to a member of management or the HR department. IPC investigates all complaints of discrimination and harassment promptly and fairly, and, when appropriate, takes immediate corrective action to stop the harassment and prevent it from recurring. 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.

If you are subjected to any conduct that you believe violates this policy, you must promptly speak to, write, or otherwise contact your supervisor, the next level above your direct supervisor, Human Resources, or a member of IPC's senior management team as soon as possible after the offending conduct. If you have not received a satisfactory response within five (5) business days after reporting any incident of what you perceive to be discriminatory conduct, please immediately contact the General Counsel. These individuals will ensure that a prompt investigation is conducted.

Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. IPC will directly and thoroughly investigate the facts and circumstances of all claims of perceived discrimination and will take prompt corrective action, if appropriate.

Additionally, any manager or supervisor who observes discriminatory conduct must report the conduct to Human Resources so that an investigation can be made and corrective action taken, if appropriate.

Your complaint may also be reported to 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.

## **Article III**

### **No Retaliation**

No one will be subject to, and IPC prohibits, any form of discipline, reprisal, intimidation, or retaliation for good faith reports or complaints of incidents of discrimination of any kind, pursuing

any discrimination claim, or cooperating in related investigations. For more information on IPC's policy prohibiting retaliation, please contact Human Resources or review IPC's Anit-Retaliation Policy.

IPC is committed to enforcing this policy against all forms of discrimination. However, the effectiveness of our efforts depends largely on employees telling us about inappropriate workplace conduct. If employees feel that they or someone else may have been subjected to conduct that violates this policy, they should report it immediately. If employees do not report discriminatory conduct, IPC may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

#### **Article IV**

##### **Violations of this Policy**

Violations of this policy, regardless of whether an actual law has been violated, will not be tolerated. IPC will promptly, thoroughly and fairly investigate every issue that is brought to its attention in this area. Any employee, regardless of position or title, who Human Resources determines has subjected an individual to discrimination or retaliation in violation of this policy will be subject to discipline, up to and including termination of employment.

#### **Article V**

##### **Administration of this Policy**

The officers of IPC will be responsible for the dissemination of this policy. Directors, managers and supervisors are responsible for implementing equal employment practices within each department. Human Resources is responsible for the administration of this policy. If you have any questions regarding this policy or questions about discrimination, accommodations, or retaliation that are not addressed in this policy, please contact Human Resources.

#### **Article VI**

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

This policy is not intended to preclude or dissuade employees from engaging in legally protected activities/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.