



Alfred P. Sloan  
FOUNDATION

## **Equal Employment Opportunity and Anti-Harassment Policy**

The Foundation expects that all employees will treat each other, as well as those doing business with the Foundation, with respect and dignity. For general guidance on workplace behavior, see the Foundation's Code of Conduct. Note, however, that the following equal employment opportunity and anti-harassment policy sets forth a more detailed explanation of requirements consistent with the principles found in the Code of Conduct.

The Foundation is an Equal Opportunity Employer and is committed to complying with all federal, state, and local equal employment opportunity ("EEO") laws. The Foundation strictly prohibits discrimination against staff members, applicants for employment, contractors, applicants for grants, and grantees because of the individual's race or color, religion or creed, alienage or citizenship status, sex (including pregnancy), national origin, age, sexual orientation, gender identity or expression, disability, marital status, familial status, domestic partnership status, genetic information or predisposing genetic characteristics, military status, domestic violence victim status, arrest or pre-employment conviction record, or any other characteristic protected by law. As detailed below, this Policy also bans discriminatory harassment. This Policy applies to all Foundation activities, including, but not limited to, recruitment, hiring, compensation, assignment, training, promotion, performance evaluation, discipline, discharge, and grant-related activities.

The Foundation will provide reasonable accommodation consistent with the law to otherwise qualified staff members and applicants with a disability or who are pregnant and to staff members and applicants with needs related to their religious observance or practices. What constitutes a reasonable accommodation depends on the circumstances and thus will be addressed by the Foundation on a case-by-case basis.

### **Discriminatory Harassment**

In general: As part of its EEO Policy, the Foundation prohibits conduct that constitutes or could lead or contribute to harassment based on an individual's race or color, religion or creed, alienage or citizenship status, sex (including pregnancy), national origin, age, sexual orientation, gender identity or expression, disability, marital status, familial status, domestic partnership status, genetic information or predisposing genetic characteristics, military status, domestic violence victim status, arrest or pre-employment conviction record, or any other characteristic protected by law. Examples of such conduct include, but are not limited to:

- ethnic slurs;

- use of Foundation computers (including via the internet) or the Foundation's email system to view or distribute racially offensive communications; and/or
- threatening, intimidating, or hostile acts directed at a particular sex or religious group or directed at an individual because of his or her sexual orientation, color, or ethnicity.
- Harassment does not require an intent to offend. Thus, inappropriate conduct or language meant as a joke, a prank, or even a compliment can lead or contribute to harassment.

Sexual harassment: Sexual harassment is a specific type of discriminatory harassment. According to the Equal Employment Opportunity Commission's (EEOC's) guidelines, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitutes sexual harassment when: (1) submission to such conduct is made explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

The Foundation prohibits conduct that constitutes or could lead or contribute to sexual harassment. Examples of such conduct include, but are not limited to:

- unwelcome sexual flirtations, advances, or propositions;
- inappropriate touching of an individual's body;
- graphic verbal comments about an individual's body or appearance;
- sexually degrading words used to describe an individual; and/or
- use of Foundation computers (including via the internet) or the Foundation's email system to display or distribute sexually explicit images, messages, or cartoons.

Supervisors: Additional rules apply to individuals with supervisory authority at the Foundation. No one with a supervisory role may at any time: (1) threaten or imply that an individual's submission to or rejection of a sexual advance, or harassment, or discrimination based on any other protected category, will in any way influence any decision regarding that individual's employment, performance evaluation, advancement, compensation, assignments, discipline, discharge, or any other term or condition of employment; or (2) make any employment decision concerning an individual on any discriminatory basis.

## **Complaint Procedures**

If you believe that you or another individual has been subjected to any conduct of the type prohibited by the Equal Employment Opportunity and Anti-Harassment Policy, you are urged and expected to report the relevant facts promptly.

The individual should ordinarily direct such reports to the Chief Compliance Officer or, alternatively, staff may direct reports to Human Resources. Staff members should choose whichever individual they feel more comfortable contacting under the circumstances. Staff

members should report the conduct regardless of the offender's position at the Foundation and should also report the conduct even if the offender is not employed at the Foundation (for example, a vendor, grantee, consultant, or temporary employee). Prompt reporting is very important so that the Foundation can take action to stop the conduct before it is repeated. All reports will be followed up promptly with further investigation conducted where needed to confirm facts or resolve disputed facts. In conducting its investigations, the Foundation will strive to keep the identity of individuals making reports as confidential as possible.

If you believe that anonymity is essential in making a report under this policy – recognizing that doing so may make your complaint more difficult to investigate – you may do so using the Foundation's Ethics Hotline. Serious concerns relating to illegal or unethical conduct can be reported by any of the following means:

- Telephone: (800) 401-8004
- Website: [www.lighthouse-services.com/sloanfoundation](http://www.lighthouse-services.com/sloanfoundation)
- Email: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (include "Sloan Foundation" in report)

Individuals who violate this policy will be subject to discipline as described in the Separation From Employment section below, and may also be subject to personal legal and financial liability under applicable law. Appropriate disciplinary action will also be taken against any staff member who knowingly and willfully makes a false allegation concerning an alleged violation of this policy.

### **No Retaliation**

Threats or acts of retaliation against individuals who report inappropriate conduct pursuant to this policy or provide information in connection with a report by another individual will not be tolerated. In the event you believe that you have been retaliated against for such action, you should use the above procedures to report the pertinent facts promptly. The Foundation will investigate and take appropriate action in the manner described above.