



## HUMAN RESOURCES INTERNAL POLICIES AND PROCEDURES

<b>Policy:</b>	<b>Anti-Harassment, Discrimination, and Retaliation</b>	<b>Version: 1.2</b>
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Intended For:	All Team Members
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Maintained By:	Karen Bhatt, VP of HR
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SDZWA is committed to maintaining a workplace that is free from all harassment, discrimination, and retaliation. In keeping with this commitment, SDZWA strictly prohibits all harassment and discrimination, including bullying, on the basis of age(over 40), race (inclusive of traits associated with race, including, but not limited to, hair texture and protective hairstyles, which include, but are not limited to, braids, locs, and twists), ethnicity, religion, religious creed (including religious dress and grooming practices), color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex (including, but not limited to, sex stereotypes, pregnancy, childbirth, breastfeeding, lactation, and related medical conditions), citizenship, primary language, immigration status, uniformed service member and veteran status, sexual orientation, gender, gender identity, gender expression (including transgender and transitioning status), political affiliation, national guard obligation, arrest and court records, domestic or sexual violence victim status, reproductive health decisions, credit history or report unless the information directly relates to a bona fide occupational qualification, or any other basis protected by applicable federal, state, or local law (collectively, "Protected Classes"). Harassment, discrimination, and retaliation based on a combination of the characteristics listed above or a perception that an individual has or is associated with a person who may have any particular characteristic(s) or combination of characteristics is also prohibited.

Such conduct by or toward any team member, contract worker, customer, vendor or anyone else who does business with SDZWA will not be tolerated. Any team member or contract worker who violates this policy will be subject to disciplinary action, up to and including termination of their employment or engagement. To the extent a customer, vendor or other person with whom SDZWA does business engages in unlawful harassment or discrimination, SDZWA will take appropriate corrective action.

It is the responsibility of every team member to report discrimination or harassment of anyone because of membership in any Protected Class that occurs during working hours or at any off-site SDZWA business or social function. The workplace also exists beyond SDZWA premises (or the physical space where you work). Harassment, discrimination, bullying, and retaliation are prohibited in any location where you are working or where SDZWA business is being conducted, where you are interacting with other SDZWA team members or third parties in the scope of your (or their) work for or with SDZWA, and where you are interacting with other SDZWA team members even if it is not work-related. This includes, but is not limited to, SDZWA business or social events offsite, conferences, customer/vendor meetings, non-SDZWA social events with other team members, and virtual spaces, such as email, text, Slack, social media, etc.

### **Prohibited Conduct**

Sexual or other unlawful harassment or discrimination includes any verbal, physical, or visual conduct based on sex, race, age, national origin, disability or any other legally protected basis if:

- submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or engagement;
- submission to or rejection of such conduct by an individual is used as a basis for decisions concerning that individual's employment or engagement; or
- it creates a hostile, offensive, or oppressive work environment.

Sexual harassment includes unwelcome sexual advances; requests for sexual favors; lewd, vulgar, or obscene remarks, jokes, posters, or cartoons; and any unwelcome touching, pinching, or other physical contact. Other forms of unlawful harassment or discrimination may include racial epithets, slurs and derogatory remarks, stereotypes, jokes, or posters or cartoons based on race, national origin, age, disability, marital status, or other legally protected categories.

### **Internal Complaint Procedures**

Any team member or contract worker who believes they have been harassed or discriminated against, or who witnesses any harassment or discrimination by a team member, contract worker, customer, vendor, or anyone else doing business with SDZWA, should immediately report such conduct to their supervisor or directly to Human Resources. If their supervisor is the alleged offender, the team member should report the conduct directly to Human Resources.

All complaints of unlawful harassment, discrimination, and/or retaliation, whether made verbally or in writing, will be taken seriously and promptly investigated. All supervisors who receive a complaint of unlawful harassment, discrimination, and/or retaliation must immediately refer the complaint to Human Resources. Upon receiving a complaint, SDZWA will enlist impartial and qualified personnel to conduct a prompt, thorough, and fair investigation. SDZWA will keep the complaint and investigation confidential to the extent possible. Complete

confidentiality cannot be guaranteed. Complaints can also be made through the Ethics and Compliance website or hotline if the team member feels that their supervisor or Human Resources representative is not the best place to raise the concern.

If SDZWA determines that unlawful harassment, discrimination, retaliation, or other improper conduct has occurred, appropriate remedial action will be taken. The remedial action may include disciplinary action against the perpetrator, communication to the complainant and, as appropriate, all others directly concerned, and any measures warranted under the circumstances that SDZWA believes will be effective in ensuring the unlawful harassment or discrimination does not reoccur.

The Chief Human Resources Officer and Vice President of Human Resources are responsible for the implementation of the Anti-Harassment, Discrimination, and Retaliation Policy and can answer any questions or concerns you may have regarding this policy.

### **Non-Retaliation**

Team members and contract workers are also protected by law from retaliation for opposing or reporting unlawful harassment or discrimination or for otherwise participating in processes connected with an investigation, proceeding or hearing conducted by SDZWA or a government agency with respect to such complaints. SDZWA will take disciplinary action up to and including the immediate termination of any team member who retaliates against another team member or contract worker for engaging in any of these protected activities. Contract workers will be subject to termination of their engagement with SDZWA for engaging in retaliation. Team members are encouraged to utilize the Internal Complaint procedure, including the [Ethics and Compliance website or hotline](#), to report concerns of retaliation.

Please contact a member of the Human Resources team if you have any questions about this policy or require further information on the subject of sexual or other harassment or discrimination. No team member will be exposed to retaliation for having opposed what they reasonably believe to be unlawful harassment, sexual harassment or discrimination, or for having filed a complaint or participated in an investigation concerning a complaint. All complaints of retaliation will be investigated in the same manner as complaints of harassment and/or discrimination.

## Document Revision History

Version	Revision Date	Summary of Changes	Revision Owners
1.1	04/12/2023	Update to Policy Template	Karen Bhatt, Vice President of Human Resources
1.2	07/29/2025	Updates to protected bases, scope of workplace, and Ethics and Compliance website/hotline link	Serena Patel, Labor & Employment Counsel