

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

The HSUS is an equal opportunity employer and is committed to ensuring equal opportunity in the conduct of all its business activities without regard to any personal characteristic or status protected under federal, state, District of Columbia, or other local law (including applicable foreign law with respect to international affiliates). Protected Characteristics include, but are not limited to, your race, color, religion, age, national origin, ancestry, sex (including pregnancy), childbirth or related medical conditions, marital status, sexual orientation, gender identity or expression, personal appearance, family responsibilities, physical or mental disability, citizenship, genetic information, matriculation, political affiliation, past, current or prospective service in the uniformed services, physical or mental disability that does not, with or without reasonable accommodation, preclude the performance of essential job functions or any other characteristic protected under applicable federal, state or local law.

## **Scope of Policy**

This policy applies to behavior that affects another employee or any other person working for or on behalf of the HSUS (including without limitation volunteers, interns, and consultants) inside the workplace or outside of the workplace, whether on HSUS business or not, whether committed by an HSUS employee, another person working for or on behalf of the HSUS, or by an external party. This policy applies with equal force to all domestic and international affiliates, and references in this policy to HSUS shall, as the context requires, be deemed references to the appropriate affiliate.

## **Commitment to Providing Equal Employment Opportunity**

Our commitment to equal employment opportunity is reflected in all aspects of our personnel policies and practices, including advertising, recruitment, interviewing, employment, training, assignment, transfer, compensation, promotion, demotion, recall, and termination policies. Similarly, all salaries, wages, other compensation, insurance programs and all other benefits or privileges of employment will be administered in conformity with this policy.

It is an objective of the HSUS to hire individuals who are qualified for positions or employment by virtue of job-related standards of education, training, and experience, and to avoid all unlawful employment and promotion practices. All employees, especially supervisors at any level, are responsible for conforming to the letter and spirit of this policy and to all applicable laws.

## **Commitment to Maintaining an Equitable and Inclusive Environment**

The HSUS is committed to maintaining an inclusive environment free of harassment based upon any Protected Characteristic. In addition, inappropriate workplace behavior, even when it does not rise to the level of a legal violation, is prohibited. All HSUS employees, other persons volunteering or working for or on behalf of the HSUS, and visitors are expected to conduct themselves in a manner that respects the dignity of others in the workplace.

### **Harassment Defined**

Harassment is a form of prohibited discrimination. Discrimination can affect any aspect of employment, including hiring, firing, pay, job assignments, promotions, vacation schedules and any other term or condition of employment. It can take many forms, including physical contact, verbal comments, visual/written communications, or other conduct. Conduct constitutes harassment when:

- (1) submission to the conduct is made either an explicit or implicit condition of the employment, volunteering, or business relationship;
- (2) submission to or rejection of the conduct is used as the basis for an employment decision, business-related decision, or assignment decision for volunteers; or
- (3) the harassment interferes with an individual's work performance or creates an intimidating, hostile, or offensive environment.

Harassment does not require an intent to offend.

Our anti-harassment policy applies equally to harassment based on all Protected Characteristics. Anyone, regardless of gender or sexual orientation, can be a bad actor, and anyone, regardless of gender or sexual orientation, can be a victim. Harassment can happen between colleagues, from a senior individual to a more junior individual, or from a junior individual to more senior individual. Harassment can also take place between an HSUS employee and a non-HSUS employee - whether that person is a community stakeholder, animal welfare partner, donor, public official, board member, intern, volunteer, applicant, vendor, or someone else who interacts with HSUS employees in the course of their work.

No form of harassment based on a Protected Characteristic will be tolerated; this includes improper conduct related to Protected Characteristics in the context of internships, volunteering, and other business relationships. Bullying (as described in the HSUS's Anti-Bullying Policy) and other inappropriate workplace behavior is also prohibited.

### **Duties of Supervisors and EAAC Members**

All people managers, including without limitation, department heads, executives, and Officers (generally, "supervisors") have a duty to understand, implement, and comply with this policy and to ensure that they and their subordinates receive mandatory training. Supervisors are expected to develop and maintain channels of communication and a working environment that permits and encourages employees and other persons working for or on behalf of the HSUS

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(including, without limitation, interns and volunteers) to raise concerns of sexual or other harassment without fear of retaliation. Supervisors are expected to stop any observed harassment and to execute their mandatory reporting obligations with consistency, sensitivity, confidentiality, and objectivity. Supervisors who observe harassing conduct—or who receive a complaint alleging harassing conduct—must immediately report the conduct so that an investigation can be initiated. (Note that after the initial report is registered, an Investigator—who may not be the person who takes the initial complaint—will be assigned and reach out later to the Supervisor.) A supervisor's failure to carry out these Mandatory Reporter responsibilities will be taken into consideration in evaluating that supervisor's performance and any corresponding salary adjustment and/or may result in disciplinary action or discharge.

Employees who are members of the Employee Advocacy & Advisory Council (EAAC) who observe harassing conduct—or who receive a complaint alleging harassing conduct—are also Mandatory Reporters. Accordingly, they must immediately report the conduct so that an investigation can be initiated.

Supervisors or EAAC representatives, when acting in their capacity as a Mandatory Reporter, should make such a report directly to the HR Department. In the event that a supervisor or EAAC representative is reporting an incident on their own behalf, they may utilize any of the reporting avenues detailed below.

Additionally, those individuals identified as the "supervisor" or "advisor" of a volunteer or intern in the formal volunteer agreement or internship agreement are Conditional Mandatory Reporters. This means that they are mandatory reporters with respect to any concerns or interactions involving volunteers or interns. Accordingly, as Conditional Mandatory Reporters, if they:

- observe harassing conduct of or by a volunteer or intern; or
- receive a complaint alleging harassing conduct of or by a volunteer or intern

they must immediately report the conduct or complaint to the HR Department so an investigation can be initiated. Conditional Mandatory Reporters are not considered to be mandatory reporters regarding incidents that do not involve a volunteer or an intern.

### Other Administrative Considerations

The Head of the Human Resources Department, in conjunction with the Office of the General Counsel, is responsible for disseminating information about this Policy, for developing training programs and guidelines for preventing sexual and other forms of harassment, and for investigating and resolving allegations of harassment.

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