

## **Equal Employment Opportunity Program**

## Table of Contents

I. Responsibility for Policy Implementation .....	3
II. Policy Dissemination .....	4
III. Recruitment/Selection .....	4
IV. Management Training .....	5
V. Internal Complaint Resolution Procedure .....	5
VI. Opportunities for the Disabled .....	7
VII. Utilizing Skills of Existing Staff .....	7
VIII. Policy Review .....	7

## **I. Responsibility for Policy Implementation**

### **A. President and Chief Executive Officer**

The President and CEO, Teresa Bazemore, is responsible for the Bank's compliance with applicable laws, guidelines, orders, policies and regulations regarding equal employment opportunity and nondiscrimination.

### **B. Officers**

All officers (those employees designated as Director level or above) are responsible for working toward achieving the goal of a representative workforce and maintaining environments and procedures free of harassment and discrimination within the organizational unit(s) under their authority.

### **C. Senior Vice President, Chief Human Resources Officer**

The Senior Vice President, Chief Human Resources Officer, Maxine Moir, reports to the President and CEO, effective January 4, 2022, and serves as the Bank's EEO Officer. Maxine has the complete and unqualified support of senior management and is assured of the resources necessary to successfully execute her responsibilities within the Bank's overall financial constraints. Specifically, she is responsible for the following:

1. Developing policy statements, plans and procedures for implementing the EEO program;
2. Partnering with the Diversity Equity and Inclusion Office (DEIO) Chief Diversity Officer (CDO) in the implementation of the Bank's Diversity Equity and Inclusion (DEI) Policy and DEIO Workforce Diversity Program and Process Standards;
3. Identifying areas of the Bank's equal employment procedures that need improvement, and recommending appropriate remedial action;
4. reviewing the policy on an ongoing basis and updating the policy as needed (at least annually);
5. Keeping management informed of all important changes in the law and policy, and preparing a statement at least annually to the Bank President and CEO and the Board of Directors concerning the status of the Bank's program for promoting equal employment opportunity;
6. Promoting an "open door" atmosphere throughout the Bank and providing counseling for workers in order to encourage informal resolution of all workplace complaints;
7. Investigating and resolving in a timely fashion all formal, internal harassment or discrimination complaints (either directly or through his or her designee), and reviewing and making recommendations regarding the investigation of all formal, external harassment or discrimination complaints;
8. Overseeing the training of Bank management and staff regarding the policy and the importance of equal employment opportunity in general;
9. Acting as liaison between the Bank and outside groups regarding equal employment issues, including but not limited to, minority, disabled and women-oriented groups, community action groups, and enforcement agencies; and
10. Ensuring the timely completion and filing of all forms required by the Equal Employment Opportunity Commission EEOC.

### **D. Managers and Supervisors**

It is the responsibility of all managers and supervisors to:

1. Assist the CHRO and EEO Officer and her staff in the identification of problem areas and formulation of solutions;
2. Regularly participate in discussions with Human Resources and officers regarding the importance and status of the EEO and DEIO Workforce Diversity Program;

3. Promptly notify Human Resources of any claims of harassment or discriminatory action or treatment brought to their attention by a worker;
4. Review the qualifications of each employee under his/her supervision to ensure that all employees are provided full opportunity for training, transfer, upgrade and promotion, and provide career counseling to employees as necessary;
5. Review position descriptions periodically to ensure they accurately reflect the jobs being performed; and,
6. Ensure that all direct reports understand the Bank's commitment to equal employment opportunity and nondiscrimination in employment.

## **II. Policy Dissemination**

The methods used by the Bank to publicize its commitment to equal employment opportunity include, but are not necessarily limited to, the following:

### **A. Internal**

1. Inclusion of the policy statement and the Bank's internal dispute resolution procedures in orientation materials for all new workers and in the Employee Handbook;
2. Prominent posting of the Bank's status as an equal opportunity employer;
3. Periodic meetings and presentations to management and staff concerning the Bank's policy; and
4. Access for all employees to a copy of the Bank's program on Empower, the Bank's intranet, and in Human Resources.

### **B. External**

1. Inclusion of a statement of the Bank's status as an equal opportunity employer on all advertisements and employment applications; and
2. Inclusion of a statement of the Bank's status as an equal opportunity employer on the Bank's corporate website.

## **III. Recruitment/Selection**

The Bank works with recruiting sources and organizations oriented toward groups that have been historically underrepresented in the workplace to ensure that members of such groups are aware of openings. Specifically, the Bank:

1. informs all recruitment sources of the Bank's commitment to equal employment opportunity, and reviews the sources annually to determine their success at generating candidates from groups that have been historically underrepresented in the workplace;
2. maintains a list of organizations focused on groups that have been historically underrepresented in the workplace, and reviews annually their effectiveness as sources of recruitment from such groups;
3. networks at events and posts available positions with placement services serving groups that have been historically underrepresented in the workplace to meet the Bank's recruitment needs; and
4. advertises in publications serving groups that have been historically underrepresented in the workplace, in addition to publications with a more general audience, to meet the Bank's recruitment needs.

## IV. Management Training

Recognizing the essential role managers play in implementing the equal employment opportunity program, the Bank has established regular training sessions for all managers and supervisors regarding the requirements of its policy and fair employment practices.

In addition, the EEO Officer and other members of Human Resources and/or Bank counsel advise managers and supervisors on matters relating to equal employment opportunity.

## V. Internal Complaint Resolution Procedure

### A. General

Any employee, contractor, or applicant who feels that he/she has been unfairly treated, harassed or discriminated against by the Bank, any of its employees, or any non-employees in the course and scope of work or the application process, because of race (including traits historically associated with race, such as hair texture and protective hairstyles), color, religion, religious creed (including religious dress and religious grooming), national origin, citizenship, ancestry, sex (including pregnancy, perceived pregnancy, childbirth, breastfeeding or related medical conditions), gender, gender identity (including transgender identity and transitioning), gender expression and sex stereotyping (including nonconformance with gender stereotypes), sexual orientation, physical or mental disability, legally protected medical or genetic condition or information, military or veteran status, caregiver status, age, family care (including status as a parent), or medical leave status, military caregiver status, status as a victim of domestic violence, sexual assault or stalking, marital status, domestic partner status, disclosing COVID-19 symptoms, a positive COVID-19 test, diagnosis, or order to quarantine or isolate, enrollment in a public assistance program, engagement in protected communications regarding employee wages, requests for a reasonable accommodation on the basis of disability or bona fide religious belief or practice, or any other basis protected by local, state or federal laws, may file a request for a formal complaint resolution review.

This policy is intended also to cover complaints made either by or against third parties, as long as the complaints arise out of the normal course of a worker's work at the Bank, or as part of an applicant's application to work at the Bank. For example, the Bank will investigate complaints of discriminatory treatment filed by outside vendors against Bank employees or filed by Bank employees or applicant(s) against such outside vendors, as long as the discriminatory activity claimed occurred in connection with the worker's responsibilities at the Bank or an applicant's application to work at the Bank.

### B. Informal Resolution

An employee with a complaint is encouraged first to discuss his/her concerns with the immediate supervisor. This provides the supervisor (working with Human Resources) an opportunity to review the employee's concern and determine the fairest solution in view of known facts. In many instances, the supervisor will be able to develop a solution satisfactory to all involved without the formal complaint resolution procedure. If a worker believes that his/her supervisor is the source of the harassing or discriminatory treatment, however, the worker should bring his/her concern directly to the attention of a Human Resources representative, as described below. Any other person (including a former employee, job applicant or third party) should bring his/her initial concerns directly to Human Resources, as described below. Workers may also report their concerns by calling Navex Global at (866) 413-1968 or online via [EthicsPoint](#). For more information on reporting concerns via EthicsPoint, please see the Bank's Concern Reporting and Whistleblower Procedures.

### **C. Request for Formal Resolution**

1. If a worker does not believe that his/her concerns have been adequately resolved after attempting an informal solution, he/she should contact the EEO Officer and request in writing a formal review of the complaint. In the case of any individual who is not a Bank employee, he/she must also provide Human Resources with his/her address and daytime phone number, and the former Bank position held or applied for, or the circumstances that brought him/her in contact with Bank workers, as applicable.
2. Although there is no required format, any request for formal review of a complaint must be in writing and describe in reasonable detail the reason for the complaint, including, but not limited to, the individual(s) involved, the action or treatment believed to be discriminatory or harassing, and the approximate time period involved.

### **D. Investigation**

Any request for review will be investigated promptly and appropriately by the EEO Officer, or her designated representative (which may include, at the Bank's sole discretion, an outside consultant). The investigation will include interviews with appropriate individuals and review of any relevant documents. The subject matter of the complaint will be discussed only with individuals directly involved, those with pertinent information, as appropriate, and with Bank counsel, with adequate safeguards to ensure that confidential personal information is treated appropriately.

The EEO Officer or her designated representative will provide timely notification of the results of the investigation. Although any written work product produced during the course of the investigation will remain the property of the Bank, the worker or other individual requesting formal review will receive a written summary of conclusions reached during the investigation, informed of any corrective measures to be taken, and reminded that he/she is protected from any retaliation for having filed a complaint.

The EEO Officer will work with the appropriate level of management to ensure that adequate corrective or disciplinary action (up to and including termination of the responsible worker at the Bank's discretion) is taken when unlawful harassing or discriminatory activity or treatment or violation of Bank policy is found. No worker will be harassed, discharged, or otherwise retaliated against as the result of having filed a complaint.

### **E. Other Remedies**

If the dispute is not resolved by the investigation, and if both the worker and the Bank agree, then the matter may be submitted to mediation, before an outside mediator jointly selected by the worker and the Bank in accordance with the procedures set out in the Employee Handbook. If the dispute is not resolved by, or submitted to, mediation, and the worker wants to pursue the matter further, the dispute must be submitted to binding arbitration, pursuant to Bank policy for the resolution of employment-related disputes generally and in accordance with the procedures set out in the Employee Handbook.

There will be no discrimination or prejudice against any worker or other individual as a result of filing or pursuing a complaint or participating in the resolution of a complaint. No Bank officer, manager, or supervisor may directly or indirectly discourage use of the dispute resolution procedure by a worker. For more information on the arbitration dispute resolution process, please see the Bank's Dispute Resolution and Binding Arbitration Procedure.

## **VI. Opportunities for the Disabled**

It is the Bank's policy to afford equal employment opportunity to all disabled employees and job applicants and to reasonably accommodate all qualified individuals with a disability, consistent with the Bank's responsibilities as a private employer under the Americans with Disabilities Act of 1990, as amended (ADA), the Fair Employment and Housing Act (FEHA), and other comparable local or state law.

## **VII. Utilizing Skills of Existing Staff**

It is the Bank's intent to utilize the skills of current employees and to afford them an opportunity to enhance those skills so that they can perform at their potential and advance according to their abilities. Accordingly, the Bank shall:

1. Maintain a system of internal job posting, which informs employees of most existing vacancies and encourages an employee to apply for any positions in which he/she is interested and for which he/she is qualified;
2. Actively encourage any minority, woman and/or disabled employee to apply for any promotional position in which he/she is interested and for which he/she is qualified;
3. Provide equal employment opportunity to any qualified internal candidate when filling any position; and
4. Publish educational tuition assistance policies that encourage each employee to enhance his/her skills and monitor those policies to ensure fairness and consistency of application.

## **VIII. Policy Review**

At least once a year, the EEO Officer shall review the effectiveness of all of the Bank's equal employment policies, programs and procedures. The results of the review, and any recommendations for changes and improvements, shall be reported to the Bank's President and CEO and the Board of Directors.