

POLICY PROHIBITING HARASSMENT, DISCRIMINATION, AND RETALIATION

Animal Equality is committed to maintaining a work environment that promotes equality and is free of harassment, discrimination, and retaliation. In furtherance of this commitment, the organization strictly prohibits all forms of unlawful discrimination and harassment, including: discrimination or harassment on the basis of sex (including pregnancy, childbirth or related medical condition, or breastfeeding), gender, gender identity or expression (including transgender identity or expression), sexual orientation, race, religious creed, color, national origin, ancestry, physical disability, mental disability, protected medical condition (including genetic characteristic), genetic information, marital status, age (for individuals over forty years of age), military or veteran status, citizenship status, and any other category protected by applicable state or federal law. To ensure the commitment is met, Animal Equality provides mandatory anti-harassment and discrimination training to all staff on an annual basis, and reviews this policy with all new employees upon hire. In addition, Animal Equality directors, managers, and supervisors are required to complete a more comprehensive annual training on preventing, identifying, and resolving instances of harassment and discrimination.

Animal Equality's policy prohibiting unlawful harassment, discrimination, and retaliation applies to all employees, including managers, officers, and directors, as well as to all interns and volunteers (collectively referred to herein as "employees"). The organization prohibits employees from harassing, discriminating, or retaliating against other Animal Equality employees, as well as the organization's supporters, vendors, suppliers, independent contractors, and others doing business with the organization. Any employee engaging in such harassment, discrimination, or retaliation will be subjected to disciplinary action, up to and including immediate termination. The organization likewise prohibits its donors, supporters, vendors, suppliers, independent contractors and others doing business with the organization from harassing, discriminating, or retaliating against our managers, supervisors, directors, employees, interns, and volunteers. Any Animal Equality manager, supervisor, director, employee, intern, or volunteer who believes that he or she has been a victim of harassment, discrimination, or retaliation by a donor, supporter, vendor, supplier, independent contractor, or other party doing business with Animal Equality is encouraged to immediately report such incident(s) to the Executive Director. All such complaints will be dealt with in a prompt and confidential manner and will result in appropriate remedial action.

Sexual Harassment: Sexual harassment includes a broad spectrum of unwelcome conduct of a sexual nature that is sufficiently persistent or offensive to unreasonably interfere with an employee's job performance or that creates an intimidating, hostile, or offensive working environment, and includes harassment based on sex, gender,

gender identity or expression, and sexual orientation. Sexual harassment can be both physical and psychological in nature. An aggregation of a series of incidents may constitute sexual harassment even if one of the incidents considered on its own would not. Employees are prohibited from harassing other employees whether or not the incidents of harassment occur on Animal Equality premises and whether or not the incidents occur during working hours. By way of illustration only, and not limitation, some examples of unlawful and unacceptable behavior include:

- unwanted sexual advances;
- offering an employment benefit (such as a raise, promotion or career advancement) in exchange for sexual favors, or threatening an employment detriment (such as termination or demotion) for an employee's failure to engage in sexual activity;
- visual conduct, such as leering, making sexual gestures, and displaying or posting sexually suggestive and/or derogatory objects or pictures, drawings, cartoons or posters;
- verbal sexual advances, propositions, requests or comments;
- sending or posting sexually-related messages, videos or messages via text, instant messaging, or social media;
- verbal abuse of a sexual nature, graphic verbal comments about an individual's body, sexually degrading words used to describe an individual, and suggestive or obscene letters, notes or invitations;
- physical conduct, such as touching, groping, assault, or blocking movement;
- physical or verbal abuse concerning an individual's gender, gender identity or gender expression; and
- verbal abuse concerning a person's characteristics such as pitch of voice, facial hair or the size or shape of a person's body, including remarks that a male is too feminine or a woman is too masculine.

Other Prohibited Harassment: In addition to the above listed conduct, Animal Equality strictly prohibits harassment concerning any other protected characteristic. By way of illustration only, and not limitation, such prohibited harassment includes:

- racial or ethnic slurs, epithets, derogatory comments and any other offensive remarks;
- jokes, whether written, verbal, or electronic;

- threats, intimidation, and other menacing behavior;
- assault, impeding or blocking movement, or any physical interference with normal work or movement;
- inappropriate verbal, graphic, or physical conduct;
- sending or posting harassing messages, videos or messages via text, instant messaging, or social media; and
- other harassing conduct based on one or more of the protected categories identified in this policy.

If you have any questions about what constitutes harassing behavior, ask your supervisor or the Executive Director.

Business Travel. Animal Equality is a nonprofit entity reliant on public support for its programs. In an attempt to limit unnecessary costs and to demonstrate the utmost respect for our donors' support, employees of the same gender and sexual orientation may be asked to share lodging or room accommodations, or other cost-sharing measures such as transportation-sharing, while traveling for Animal Equality business. However, we also recognize that employee room and cost-sharing may, under certain conditions, expose employees to an increased risk of harassment or threats to an individual's physical and/or emotional safety. As stated above, this policy prohibits *all* harassment, whether or not the incidents of harassment occur on Animal Equality premises or during working hours, including incidents of harassment occurring during business travel.

Any employee concerned that room or cost-sharing will expose them to harassment or discrimination of any kind, may request single room accommodations while traveling for Animal Equality business. In addition, employees requiring medical or disability accommodations are exempt from room sharing requests while traveling for Animal Equality business. All accommodation requests pursuant to this policy should be made to the HR Department as soon as reasonably possible after being notified of any forthcoming business travel. Animal Equality employees of different genders and/or the same gender and different sexual orientations will not be requested to share rooms while traveling for business.

This policy does not prohibit room or cost-sharing between employees of the same gender where it is the preference of all employees involved. Employees who consent to room and/or cost-sharing while traveling for Animal Equality business per the above policy will be required to submit a written acknowledgement of such consent prior to booking accommodations. Finally, Animal Equality employees are *not* permitted to accept overnight accommodations from donors or other third parties with

ongoing business or professional connections to Animal Equality under any circumstance, unless given prior written approval by the Executive Director.

Prohibition Against Retaliation: Animal Equality is committed to prohibiting retaliation against those who themselves or whose family members report, oppose, or participate in an investigation of alleged unlawful harassment, discrimination, or other wrongdoing in the workplace. By way of example only, participating in such an investigation includes, but is not limited to:

- filing a complaint with a federal or state enforcement or administrative agency;
- participating in or cooperating with a federal or state enforcement agency conducting an investigation of the organization regarding alleged unlawful activity;
- testifying as a party, witness, or accused regarding alleged unlawful activity;
- making or filing an internal complaint with the organization regarding alleged unlawful activity;
- providing notice to the organization regarding alleged unlawful activity; and
- assisting another employee who is engaged in any of these activities.

Animal Equality is further committed to prohibiting retaliation against qualified employees who request a reasonable accommodation for any known physical or mental disability and employees who request a reasonable accommodation of their religious beliefs and observances.

Complaint Procedures. Please follow the procedures below if you feel you are being or have been harassed, discriminated against, or retaliated against:

If you feel that you are being or have been harassed, discriminated against, or retaliated against in violation of this policy by another employee, manager, officer, director, or third party doing business with the organization, you should report the incident(s) to your immediate supervisor or to the Executive Director as soon as possible. Animal Equality has the following complaint form available for making such reports, although its use is not compulsory. In addition, if you observe harassment by another employee, director, manager or non-employee, please report the incident immediately to the individual(s) listed above. It is helpful, but not required, to provide a written record of the date, time, and nature of the incident(s) and the names of any witnesses.

Managers and directors who receive any complaint of harassment, discrimination, or retaliation must promptly report such complaint to the Executive Director so that the

organization may conduct an immediate and impartial investigation and take appropriate action to remediate or prevent the prohibited conduct from continuing. Managers and directors must take all complaints alleging harassment or discrimination seriously, no matter how minor the allegation or who is involved. Managers and directors who knowingly allow or tolerate harassment, discrimination, or retaliation, including the failure to promptly report such conduct to the Executive Director, are in violation of this policy and are subject to discipline. Complaints concerning allegations of harassment, discrimination, or retaliation by a manager or director will be reported to all members of the Board of Directors.

Animal Equality's Executive Director currently serves as the organization's human resources director. In this capacity, the Executive Director is responsible for (i) ensuring that both the individual filing the complaint (the "complainant") and the individual accused of violating this policy (the "respondent") are aware of the seriousness of the complaint; (ii) explaining Animal Equality's harassment and discrimination policy and investigation procedures to the complainant and respondent; (iii) notifying the police if criminal activities are alleged; (iv) arranging for an investigation of the alleged harassment and the preparation of a written report; (v) submitting a written report summarizing the results of the investigation and making recommendations to the relevant managers and/or board members; and (vi) notifying the complainant and the respondent of the corrective actions to be taken, if any, and administering those actions.

Your notification of the problem is essential to us. We cannot resolve allegations of harassment or discrimination unless we know about it. Therefore, it is your responsibility to bring your concerns and/or problems to our attention so we can take whatever steps are necessary to address the situation. The organization takes all complaints of unlawful harassment seriously and will not penalize you or retaliate against you in any way for reporting a harassment problem in good faith.

All complaints of unlawful discrimination, harassment, or retaliation which are reported to management in accordance with this policy will receive a timely response and will be thoroughly investigated in a fair and prompt manner by impartial and qualified personnel. Investigations will be conducted in a manner which provides all parties with appropriate due process, reaches a reasonable conclusion based on evidence collected and ensures timely closure. In addition, the organization will ensure that the investigation is properly documented and tracked for reasonable progress and that appropriate remedial, corrective, and/or disciplinary action is taken, where found to be warranted. Any Animal Equality employee found to have committed sexual or other harassment as a result of such investigation will be subject to immediate termination. The organization prohibits employees, supervisors, and managers from hindering investigations and the internal complaint procedure. The procedure for reporting incidents of harassment and discrimination is not intended to impair, replace, or limit the right of any employee to seek a remedy under available state or federal law by immediately reporting the matter to the appropriate state or federal agency.

Confidentiality. All inquiries, complaints, and investigations are treated confidentially. Information is revealed strictly on a need-to-know basis. Information contained in a formal complaint is kept as confidential as possible. However, the identity of the complainant may be revealed to the respondent and witnesses. The Executive Director is responsible for taking adequate steps to ensure that the complainant is protected from retaliation during the period of investigation. All information pertaining to harassment and discrimination complaints or investigations is maintained by the Executive Director in secure files. The Executive Director can answer any questions relating to the procedures for handling information related to harassment and discrimination complaints and investigations.

Violation of this policy will subject an employee to disciplinary action, up to and including immediate termination. Additionally, under California law, employees may be held personally liable for harassing conduct that violates the California Fair Employment and Housing Act.