

Equal Employment Opportunity Policies

Introduction

At Switchpoint we take pride in providing equal employment opportunities to everyone regardless of their race, ethnicity, beliefs, religion, marital status, gender, gender identity, citizenship status, age, veteran status, disability, or other protected class or characteristic.

Accordingly, the purpose of this policy is to reinforce our commitment to the creation and maintenance of a diverse workplace where equality, respect, and consideration for one another are the norm.

EEO Policy

It is the policy of Switchpoint to provide equal employment opportunities to all employees and employment applicants and other covered persons without regard to unlawful considerations of race, color, religion, sex, gender identity, sexual orientation, pregnancy (including childbirth, pregnancy-related conditions, and breastfeeding), age (40 years or older), national origin, disability, veteran's status, genetic information, or any other classification protected by applicable local, state, or federal laws.

This policy applies to all aspects of employment, including, but not limited to, hiring, job assignment, compensation, promotion, benefits, training, discipline, and termination.

Reasonable accommodation is available for qualified individuals with disabilities in accordance with applicable federal, state, and local law. Switchpoint expects all employees to act in accordance with our equal employment opportunity policy, and to take all steps necessary to maintain a workplace free from unlawful discrimination, harassment, and retaliation.

In the event you believe that a violation of this policy has occurred, please follow the Complaint Procedure. Switchpoint will investigate your complaint and take appropriate remedial action. No one will be subject to, and Switchpoint prohibits, any form of discipline, reprisal, intimidation, or retaliation for good faith reports or complaints of incidents of discrimination of any kind, pursuing any discrimination claim, or cooperating in related investigations.

Anyone who violates this policy will be subject to discipline, up to and including termination of employment. This policy is not intended to restrict communications or actions protected or required by state or federal law.

At **Friends of Switchpoint**, we have zero tolerance for any type of discrimination or harassment against our employees by their peers, supervisors, customers, or vendors. This assurance is also reflected in our policies regarding: recruiting, advertising, hiring, placement, promotion, training, transfer, payment, benefits, termination and any relevant privileges, terms, and conditions of employment.

Anyone with questions or concerns about the implementation of or compliance with this or any related policies should address them to the Human Resources Department.

POLICY AGAINST HARASSMENT, DISCRIMINATION, AND RETALIATION

Switchpoint is committed to providing a work environment free of sexual or any other form of unlawful harassment, discrimination, or retaliation.

Any employee who believes a co-worker has potentially experienced harassment or discrimination should promptly report the incident and the names of those involved to their manager, human resources, or other executive. Managers should report potential harassment or discrimination to human resources or the executive director.

Retaliation for reporting is prohibited. Harassment or unlawful discrimination against individuals on the basis of race, color, religion, sex, gender identity, sexual orientation, pregnancy (including childbirth, pregnancy-related conditions, and breastfeeding), age (40 years or older), national origin, disability, genetic information, or any other characteristic protected by applicable local, state, or federal laws is illegal and prohibited by Company policy. Such conduct by or towards any employee, contract worker, customer, vendor, or anyone else who does business with Switchpoint will not be tolerated.

Discrimination

Switchpoint maintains a strict policy against discrimination and harassment, in any form, because of race, color, sex, gender, pregnancy, religion, national origin, ancestry, age (40 years and above), physical or mental disability, veteran status, domestic violence victim status, sexual orientation, genetic information, marital or domestic partnership status, gender identity and expression or any other basis covered by applicable federal, state or local law, ordinance or regulation (which will be collectively referred to as “protected categories”). This policy applies to all persons involved in the operations of Switchpoint and prohibits discrimination, harassment or retaliation by any employee of Switchpoint, including members of management, supervisors, and co-workers, and any vendors, independent contractors or clients on our premises or at any location relating to the business of Switchpoint. Prohibited discrimination, harassment and retaliation, in any form, including verbal, physical and visual conduct, threats, demands, are prohibited.

If you believe you have experienced or witnessed discrimination in the workplace, you must report using the steps outlined below so Switchpoint can investigate.

Sexual Harassment

Switchpoint expressly prohibits any form of unlawful harassment based on a characteristic protected by law, including but not limited to sexual harassment. Unlawful interference with the ability of Company employees to perform their expected job duties will not be tolerated. It is Switchpoint’s policy that any individual who is determined to have violated this policy may be subject to discipline up to and including termination of employment.

Each supervisor or manager strives to keep the workplace free of sexual harassment. No supervisor or manager may threaten or insinuate that refusal or willingness to submit to sexual advances will affect an employee's employment. Supervisors and managers are required to immediately forward reports of harassment to the Human Resources Manager.

All sexually harassing or offensive conduct in the workplace or as a result of a workplace relationship is prohibited, whether committed by an Switchpoint employee, member of the public, client or other person with a relationship to Switchpoint. Examples of prohibited conduct include, but are not limited to:

- (a) Prohibited Conduct.
 - (i) Sexual Harassment.

Switchpoint expressly prohibits any form of unlawful harassment based on a characteristic protected by law, including but not limited to sexual harassment. Unlawful interference with the ability of Switchpoint employees to perform their expected job duties will not be tolerated.

Specifically with regard to sexual harassment, Switchpoint prohibits unwelcome

- (A) sexual advances or requests for sexual favors; and
- (B) all other verbal, physical, or visual conduct of a sexual nature, particularly where 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 or offensive work environment.

Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors and lewd, vulgar or obscene remarks, jokes, posters or cartoons, and any unwelcome touching or other verbal or physical conduct of a sexual nature.

This list is not exhaustive. All forms of harassment are prohibited both in the workplace and at employer-sponsored events.

- (ii) Other Forms of Harassment.

Other forms of unlawful harassment or discrimination are also strictly prohibited. Such unlawful harassment or discrimination may include racial epithets, slurs and derogatory remarks, stereotypes, jokes, posters or cartoons based on race, religion, color, national origin, sex, age, disability, genetic information, military status, or any other characteristic protected by applicable local, state, or federal laws.

Prohibited harassment might occur through the use of Switchpoint 's electronic communications system, or through other on-line conduct.

Harassment and discrimination because of a protected category may occur where the conduct has the purpose or effect of unreasonably interfering with the employee's work performance or creating an intimidating, hostile, or offensive working environment and includes, but is not limited to:

- Verbal conduct such as epithets, derogatory comments, slurs, or unwanted invitations or comments based upon the protected category.
- Visual conduct such as derogatory posters, photography, cartoons, drawings, or gestures, relating to any protected category or characteristic.
- Physical conduct such as unwanted touching, blocking normal movement, or interfering with work because of a protected characteristic.
- Taking a tangible employment action against an employee because of a protected category or a protected characteristic.

If you have any questions about this policy or concerns about what constitutes harassment, please bring them to the attention of Human Resources.

Policy Against Retaliation

Switchpoint endeavors to maintain an environment free from harassment, discrimination, and retaliation. Employees should feel comfortable reporting complaints or concerns about violations of Switchpoint policies or procedures or applicable laws without fear of retaliation. In furtherance of this policy, Switchpoint prohibits retaliation against employees who make complaints or report concerns—or who provide information or participate in investigations or proceedings—regarding workplace discrimination or harassment and/or workplace violations of, or non-compliance with, matters including, but not limited to, applicable federal, state, or local laws, rules, and regulations, Switchpoint policies, or Switchpoint procedures.

Retaliation means taking adverse action against an employee because the employee makes a complaint or reports concerns—or provides information or otherwise participates in an investigation or proceeding about complaints or concerns—regarding workplace discrimination or harassment and/or workplace violations of, or non-compliance with, applicable federal, state, or local laws, rules, and regulations, Switchpoint policies, Switchpoint procedures, or other applicable rules. Adverse actions can include, but are not limited to, demotion, denial of promotion, suspension without pay, termination, decrease in pay, other denials of benefits of employment to employees, and fostering a hostile work environment.

If you feel you were subject to retaliation or are aware of retaliation against another employee, you should report this to the Executive Director and/or Human Resource Department. This policy is not meant to impede you from bringing a claim to, or providing information to, appropriate governmental authorities regarding possible violations of state, local, or federal law, or making disclosures pursuant

to whistleblower laws. It is also not intended to impede you from discussing terms and conditions of employment with other employees.

Any employee who engages in retaliation or otherwise violates this policy may be subject to disciplinary action up to and including termination of employment.

COMPLAINT PROCEDURE - Reporting Discrimination, Harassment, & Retaliation

Employees who believe that they have been harassed, discriminated, or retaliated against, or who witness any such conduct by an employee, contract worker, customer, vendor, or anyone else who does business with Switchpoint, should immediately report such conduct to their supervisor, human resources, and a member of the executive team.

In response to the complaint, Switchpoint will conduct an investigation and, if it concludes that improper conduct occurred, take appropriate action.

In certain circumstances, Switchpoint may direct employees to keep an employee's complaint and any related investigation confidential or as confidential as possible to further the goals of federal, state, and local harassment and discrimination laws. Moreover, nothing contained in any such confidentiality directive or in this Complaint Procedure is intended to prohibit employees from discussing terms and conditions of employment with others, reporting to any government agency, including the National Labor Relations Board and the Equal Employment Opportunity Commission or parallel state agency, possible violations of federal or state law or regulation, or making, to any government agency, any other disclosures that are protected under the whistleblower or any other provisions of federal or state law or regulation.

Switchpoint expects that all employees will cooperate with Switchpoint investigations.

Switchpoint will not retaliate against employees for opposing or reporting in good faith unlawful harassment or discrimination or for otherwise participating in good faith in processes connected with an investigation, proceeding, or hearing conducted by Switchpoint or a government agency with respect to such complaints. Switchpoint may take disciplinary action, up to and including the termination of any employee who retaliates against another employee for engaging in protected activities.

Any employee who has questions about this policy or requires further information on the subject of sexual or other harassment or discrimination should contact the Human Resources department.