

EQUAL EMPLOYMENT OPPORTUNITY AND PREVENTION OF DISCRIMINATORY HARASSMENT

Equal Employment Opportunity

The Wallace Foundation (the "Foundation") is an Equal Employment Opportunity employer and is committed to complying with all federal, state and local equal employment opportunity ("EEO") laws.

The Wallace Foundation prohibits discrimination against employees and applicants for employment because of the individual's race or color, religion or creed, alienage or citizenship status, sex, national origin, age, sexual orientation, gender identity, pregnancy, status of being transgender, disability, marital status, familial status, caregiving responsibilities, domestic partnership status, genetic information or predisposing genetic characteristics, military status, domestic violence victim status, arrest or pre-employment conviction record, or any other characteristic protected by law.

This policy applies to all activities of the Foundation, including, but not limited to, recruitment, hiring, compensation, assignment, training, promotion, performance evaluation, discipline and termination.

Discriminatory Harassment

The Foundation prohibits conduct that constitutes or could lead or contribute to harassment for the characteristics enumerated in this policy. Examples of such conduct include, but are not limited to:

- ethnic slurs;
- use of the Foundation's computers (including via the Internet) or e-mail system to view or distribute racially offensive communications; and/or
- threatening, intimidating, or hostile acts directed at a particular religious group or directed at an individual because of his or her age, color or ethnicity.

Harassment does not require intent to offend. Thus, inappropriate conduct or language meant as a joke, a prank, or even a compliment can lead or contribute to harassment.

Reporting Procedures

If you believe that you or another individual has been subjected to any conduct of the type prohibited by this policy, you are urged and expected to report the relevant facts promptly.

Employees should ordinarily direct reports of such behavior to their manager, the Chief Administrative Officer or the President. Employees should choose whichever individual they feel more comfortable with under the circumstances. Employees may also direct reports to reporting@wallacefoundation.org. Employees should report the conduct regardless of the individual's position or if the individual is a vendor or consultant.

Prompt reporting is very important so that the Foundation can take action to stop the conduct before it is repeated. All reports will be followed up promptly, with further investigation conducted where needed to confirm facts or resolve disputed facts. In conducting its investigations, the Foundation will strive to keep the identity of individuals making reports as confidential as possible.

Individuals who violate this Policy will be subject to appropriate disciplinary action, up to and including termination. Appropriate disciplinary action will also be taken against any employee who knowingly and willfully makes a false allegation concerning an alleged violation of this Policy.

No Retaliation

Threats or acts of retaliation against individuals who report inappropriate conduct pursuant to this policy or provide information in connection with a report by another individual will not be tolerated. In the event you believe that you have been retaliated against for such action, you should use the above procedures to report the pertinent facts promptly. The Foundation will investigate and take appropriate action in the manner described above.

Reasonable Accommodation

Consistent with its obligations under federal, state and local laws to provide reasonable accommodations, the Foundation will engage in a good faith cooperative dialogue with otherwise qualified employees and applicants who have requested an accommodation related to disability; religious observance or practice; pregnancy, childbirth or related conditions; and needs related to status as a victim of domestic violence, sex offenses, or stalking.

What constitutes a reasonable accommodation is dependent on the circumstances and thus will be addressed on a case-by-case basis. Following the cooperative dialogue, the Foundation will provide a final written determination identifying any accommodation granted or denied.

This policy statement is not a contract of employment. The Wallace Foundation reserves the right to change or revoke this policy statement at any time without notice.