

Workplace Conduct: Protecting Our Own and Holding Ourselves Accountable

Respectful Workplace Culture and Prohibition of Harassment, Discrimination, and Retaliation Policy

Project HOPE is committed to a workplace in which all individuals can work to their fullest potential. This includes prohibiting discrimination and harassment that would be illegal under the applicable local law as well as prohibiting behavior that is inconsistent with the values of Project HOPE, even if such behavior would not violate the law.

Project HOPE is committed to a workplace in which all individuals are treated with respect and dignity. We expect that such respect will be demonstrated in any activity in which Project HOPE takes part. A respectful workplace is the foundation for a productive and constructive workplace environment.

As a humanitarian and development international health organization, Project HOPE holds itself accountable to the highest level possible in ensuring that everyone employed by Project HOPE, or who comes into contact with Project HOPE, will be treated with respect and dignity.

This policy covers:

- I. A Respectful Workplace**
- II. Personal Relationships**
- III. Prohibition of Harassment on Protected Characteristics**
- IV. Prohibition of Discrimination on Protected Characteristics and Reasonable Accommodation**
- V. Complaint & Investigation Procedures**
- VI. Prohibition of Retaliation**
- VII. Filing a Legal Complaint**

Reinforcing a culture of respect, integrity, accountability and transparency

I. A Respectful Workplace

Regardless of an individual's personal status, level in the organization, or office location, every individual employed by, associated with, or who comes into contact with Project HOPE, must be treated with respect and dignity. Coworkers, supervisors, senior leadership, interns, day laborers, consultants, contractors, Board Directors and participants in Project HOPE meetings, trainings, programs and responses, are expected to treat each other with respect both inside and beyond the workplace.

In a respectful workplace, individuals acknowledge and value the contributions of others, treat others with civility and courtesy, and engage in open and honest communication. Individuals do not embarrass or humiliate others, trivialize or disregard the contributions of others, or engage in bullying behavior.

This does not mean that employees and others will not be given honest and critical feedback on their work or conduct. However, at Project HOPE, we expect that such feedback will be delivered in a respectful and constructive manner, and to the extent possible, not in a public setting.

We all must work together to create a safe, respectful, diverse, and inclusive environment that reflects the core values of Project HOPE.

II. Personal Relationships

Supervisors may not have a romantic relationship with a subordinate. If a romantic relationship develops, the direct reporting relationship must be removed or one of the individuals in the relationship must leave Project HOPE.

A Board Director may not have a romantic relationship with an employee at Project HOPE. If a romantic relationship develops, either the employee must leave Project HOPE or the Director member must resign from the Board.

Romantic relationships between co-workers are not prohibited, but should be disclosed to a supervisor, Human Resources, or the Compliance Officer. If such a relationship results in a perceived, actual or potential conflict of interest, the situation must be reported and steps taken to remove the conflict. A conflict of interest exists if, for example, one person in the relationship has the authority to influence the workload or financial resources of the other person or if duties involved checks and balances for Project HOPE's internal controls. If the conflict of interest cannot be eliminated, either the romantic relationship must end or one person in the relationship must leave Project HOPE.

Project HOPE is committed to ensuring that no employee is or feels coerced or pressured into entering a romantic relationship with a co-worker. For example, if an employee declines an invitation to date a co-worker, the co-worker should not ask again. Moreover, while consensual romantic relationships between co-workers are not prohibited, employees must comport themselves in a professional manner that is respectful of others around them. This includes refraining from public displays of affection that may make others feel uncomfortable. In addition, the relationship may not interfere with either of the employee's ability to perform his/her/their job up to the required standards.

No employee or Board Director may enter into a romantic relationship with an applicant for a job, internship or volunteer position at Project HOPE during the time period that the individual is applying for the job, internship or volunteer position.

III. Prohibition of Harassment on Protected Characteristics

Project HOPE prohibits harassment that is based on categories that are protected under the law. Given Project HOPE's global operations, we have adopted a broad scope of protected characteristics. As such, Project HOPE protects certain characteristics that may not be protected under the laws in all locations in which Project HOPE operates. As a humanitarian and

development international health organization, Project HOPE holds itself to the highest level possible in ensuring that everyone employed by Project HOPE, or who comes into contact with Project HOPE, will be treated with respect and dignity.

In all cases, this policy prohibits *any* form of unwelcome behavior based on the characteristics listed below, *even if* such behavior may not violate the law because it is not yet sufficiently severe or persistent to rise to the level of creating a hostile work environment for the individual.

The characteristics covered by this policy and/or protected by law include the following:

- Race or color
- National origin or ancestry (what country a person or a person's family is from) or immigration or citizenship status
- Religion
- Sex (including women who are pregnant, have given birth, or are breastfeeding); non-binary status, or sex stereotyping (assumptions about how a person should appear or behave based on his, her or their gender)
- Sexual orientation (whether the person is lesbian, gay, bisexual, heterosexual, or asexual) or gender identity (whether the person is transgender)
- Age
- Mental or physical disability, any medical condition, or genetic information (for example, whether a person carries a genetic marker for a disease)
- Marital status (whether the person is married, not married, divorced, or widowed) or familial status (whether the person has children or not)
- Military or veteran status
- Political affiliation or certain political activities conducted in one's non-work capacity
- Status as a victim of domestic violence, stalking, or a sex offense
- Caregiving responsibilities
- Sexual or reproductive health decisions
- Prior arrest or conviction
- Or any other status of an individual protected under state or local law.

Examples of harassment behaviors based on these protected characteristics that are prohibited by this policy, include, but are not limited to:

- Unwelcome verbal conduct such as threats, epithets, derogatory comments or slurs, derogatory jokes, or comments or teasing about an individual's dress or presentation;
- Unwelcome postings such as posting derogatory posters, photographs, cartoons, or drawings and
- Unwelcome physical conduct such as assault or unwanted touching.

Harassment on the basis of sex may be overtly sexual, or it may not be sexual at all but still be unwelcome behavior based on an individual's status as male, female, or non-binary or sexual orientation.

In addition to the unwelcome behaviors described above, examples of sexual harassment prohibited by this policy include, but are not limited to:

- Sexual assault;
- Conditioning employment benefits on sexual favors or treating someone more favorably because the individual has provided sexual favors;
- Touching a person's body or private parts, or touching an individual in a sexually suggestive manner, without the person's consent;
- Repeated unwanted sexual flirtations, advances, or propositions;
- Leering or suggestive sexual gestures;
- Verbal abuse of a sexual nature, such as graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, or sexually suggestive or obscene letters, notes, or invitations; and
- Retaliating or threatening retaliation against an individual after a negative response from that individual to sexual advances or other potentially harassing activities.

These forms of sexual harassment can occur regardless of the sex, sexual orientation, or gender identity of any of the individuals involved.

Harassment based on sex, or any other protected characteristic is prohibited whether it is based on the characteristic of the individual who is the target of that behavior, or because of a characteristic of that individual's associates or relatives. It does not matter whether the person engaging in the inappropriate behavior is correct about the individual's characteristics. Finally, this behavior is prohibited even if the behavior is not targeted against a specific person but is instead targeted at a general community.

The behavior prohibited by this policy can occur anywhere and is not limited to the physical workplace. This type of behavior is prohibited when traveling for business, attending a Project HOPE site, or sponsored event, or socializing with Project HOPE employees outside of the workplace. It is prohibited via calls, texts, emails, instant messages, blog or message board posts, or social media usage, even if one is away from the workplace, using personal devices, or acting during non-work hours if the behavior could have an impact on the workplace.

The behavior described in this policy is prohibited whether it is engaged in by or directed against employees (including coworkers, supervisors, and senior leadership), paid or unpaid interns, job or internship applicants including prospective volunteers or consultants, contractors, meetings, training, programs and responses participants at meetings sponsored by Project HOPE or Board Directors. All of these individuals make up and affect the workplace culture at Project HOPE and therefore all are expected to comply with the requirements of this policy.

While the corrective action that can be taken against such individuals will necessarily differ based on their relationship to the organization, our expectation is that everyone affiliated with Project HOPE or who interacts with Project HOPE will not engage in the behavior prohibited by this policy.

At the end of this policy, you will find information on how to file a legal complaint within your jurisdiction if you feel you have been harassed based on a protected characteristic. If you would like to express concern over behaviors that you have witnessed, please see the reporting section at the end of this policy.

IV. Prohibition of Discrimination on Protected Characteristics and Reasonable Accommodation

Project HOPE prohibits discrimination that is based on categories that are protected under the law. Given Project HOPE's global operations, we have adopted a broad scope of protected characteristics. As such, Project HOPE protects certain characteristics that may not be protected under the laws in all locations in which Project HOPE operates.

As a humanitarian and development international health organization, Project HOPE wishes to hold itself to the highest level possible in ensuring that everyone employed by Project HOPE, or who comes into contact with Project HOPE, will be treated with respect and dignity.

Project HOPE will not make employment decisions based on protected characteristics. In all cases, an employee with protected characteristics will be expected to perform the essential functions of the job, with reasonable accommodation if necessary.

A. Protected Characteristics

Project HOPE prohibits discrimination on the basis of categories protected under federal, state, and local law, as well as some additional categories.

All individuals at Project HOPE are required to make **employment decisions** without regard to the following characteristics:

- race or color
- national origin or ancestry (what country a person or a person's family is from) or immigration or citizenship status
- religion
- sex (including women who are pregnant, have given birth or are breastfeeding); non-binary status, or sex stereotyping (assumptions about how a person should appear or behave based on his, her or their gender)
- sexual orientation (whether the person is lesbian, gay, bisexual, heterosexual or asexual) or gender identity (whether the person is transgender)
- age (if an individual is 40 years or older)
- mental or physical disability, any medical condition, or genetic information (for example, whether a person carries a genetic marker for a disease)
- marital status (whether the person is married, not married, divorced or widowed) or familial status (whether the person has children or not)
- military or veteran status

- political affiliation or activity (e.g., voting, running for political office or campaigning for a political candidate)
- prior arrest or conviction
- status as a victim of domestic violence, stalking, or a sex offense
- caregiving responsibilities
- sexual or reproductive health decisions
- any other status of an individual protected under state or local law.

This prohibition of discrimination covers all forms of **employment decisions** including:

- recruiting, testing, screening, and hiring
- promotion, training program selection, assignments, and transfers
- discipline and demotion
- compensation, benefits, and any other terms, conditions, or privileges of employment
- layoffs and termination

B. Reasonable Accommodation

In all cases, an employee with protected characteristics will be expected to perform the essential functions of the job, with reasonable accommodation if necessary. Project HOPE will provide reasonable accommodations to:

- employees with disabilities to enable them to perform the essential functions of the job, as long as the accommodation does not impose an undue hardship on Project HOPE;
- applicants with disabilities to enable them to apply for a job or internship, as long as the accommodation does not impose an undue hardship on Project HOPE;
- employees who require accommodations because of their religious practices as long as the accommodation does not impose an undue hardship on Project HOPE;
- pregnant workers, as required under applicable law.

At the end of this policy, you will find information on how to file a legal complaint within your jurisdiction if you feel you have suffered from discriminatory employment based on a protected characteristic. If you would like to express concern over behaviors that you have witnessed, please see the reporting section at the end of this policy.

V. Complaint & Investigation Procedures

Project HOPE encourages reports of violations of this policy as soon as possible after a violation has occurred. *The best time to correct a violation of this policy is as early as possible.*

If you experience disrespectful behavior, we encourage you to talk directly with the individual engaging in that behavior if you feel comfortable doing so. If not, we encourage you to talk with a supervisor, or any other individual you believe may be helpful in addressing the behavior.

If you experience or witness bullying behavior, we encourage you to talk with a supervisor or the:

- Chief Compliance Officer/or their designee: Thelvis Pascuzzo
 - tpascuzzo@projecthope.org
 - Phone/WhatsApp: +58 414 9157988
- General Counsel: Julia Soyars
 - jsoyars@projecthope.org
 - Phone/WhatsApp: +1 540-429-1781
- Project HOPE Speak Up line: online reporting at:
<https://app.mycompliancereport.com/report?cid=PHOPE>
**Anonymous reporting available*

If you experience or witness harassing or discriminatory behavior, we encourage you to talk with a supervisor or the:

- Chief Compliance Officer/or their designee: Thelvis Pascuzzo
 - tpascuzzo@projecthope.org
 - Phone/WhatsApp: +58 414 9157988
- General Counsel: Julia Soyars
 - jsoyars@projecthope.org
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- Project HOPE Speak Up line: online reporting at:
<https://app.mycompliancereport.com/report?cid=PHOPE>
**Anonymous reporting available*

If you experience or witness bullying, harassing or discriminatory behavior by a member of the Senior Leadership Team, we encourage you to contact the Chair of the Audit Committee directly through the Project HOPE Speak Up line: online reporting at:

<https://app.mycompliancereport.com/report?cid=PHOPE>
**Anonymous reporting available*

A supervisor who receives a report of harassing or discriminatory behavior or who observes harassing or discriminatory behavior must report such behavior to the Chief Compliance Officer or the General Counsel. The supervisor must make that report even if the person who has made the complaint does not wish the incident to be reported or investigated.

Project HOPE will conduct a fair, thorough, and timely investigation into all reports of behavior that violate this policy. When appropriate, Project HOPE may engage an outside investigator. The individual who has reported the behavior, the target of the behavior (if different from the individual who reported the behavior), and anyone who allegedly violated this policy will be offered an opportunity to be interviewed or to otherwise respond to a report under this policy.

Employees are required to cooperate as needed in an investigation and must provide full and truthful information. Individuals who are not employees but who have reported a violation of

this policy or have allegedly violated this policy will be expected to participate in an investigation so that Project HOPE can discharge its responsibility to enforce this policy.

Project HOPE will keep the investigation confidential to the greatest extent possible, consistent with a fair and full investigation. However, Project HOPE retains the right to inform those with a “need to know” about the allegation and/or the findings of the investigation.

If needed based on the alleged facts, Project HOPE may use interim measures, such as a leave of absence, while the investigation proceeds. To the fullest extent possible, the individual who made the report will not be subject to any interim measure that disadvantages the individual, unless that individual explicitly requests a particular interim measure.

If an investigation reveals a violation of this policy, Project HOPE will take corrective action that is proportionate to the prohibited behavior. Proportionality means that the corrective action may include an oral warning, a written warning, suspension (with or without pay), or termination of employment. It may also include coaching and training for the individual found to have engaged in the prohibited behavior. Whether or not a violation of the policy is found, preventive action may include additional training for all employees.

VI. Prohibition of Retaliation

To foster an inclusive culture where every individual is treated with respect and protected from bullying, harassment and discrimination, individuals who experience or observe such behavior must feel safe in reporting the behavior.

This policy forbids an employee, intern, supervisor, contractor, senior leadership or Board Director from retaliating against any individual who reports behavior prohibited by this policy, assists an individual in making a report, cooperates in an investigation of the alleged misconduct, files an administrative claim with the EEOC or any other governmental agency, testifies or assists in any legal proceedings related to the complaint, or makes a public statement in response to a public accusation.

This policy prohibits all forms of retaliation in the workplace. Retaliation may consist of harmful actions on a professional level (for example, removing an important project or not providing necessary information on a project) or on a social level (for example, ostracizing the person within the work team.) All forms of retaliation are prohibited by this policy and Project HOPE will take swift corrective action against any individual found to have engaged in retaliation.

VII. Filing a Legal Complaint

Discrimination and harassment on the bases of most of the characteristics listed in this policy are also illegal under federal and/or local law. Project HOPE respects your right to file a legal

complaint. In the U.S., please contact the Equal Employment Opportunity Commission in any State or the State Human Rights Commission where you are located if you feel you have experienced discrimination or harassment. For Project HOPE's representative and branch offices, please contact your local Human Resources department.