

GOODWILL OF COLORADO

Policy 45-43

September 1, 2020

HUMAN RESOURCES

Equal Employment Opportunity/Unlawful Harassment

Goodwill of Colorado is dedicated to the principles of equal employment opportunity. We prohibit unlawful discrimination against applicants or employees on the basis of age 40 and over, color, disability, gender identity, genetic information, military or veteran status, national origin, race, religion, sex, sexual orientation or any other applicable status protected by state or local law. This prohibition includes unlawful harassment based on any of these protected classes. Unlawful harassment includes verbal or physical conduct which has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. This policy applies to all employees, including managers, supervisors, co-workers, and non-employees such as customers, clients, vendors, consultants, etc.

The Goodwill of Colorado will make reasonable accommodation for qualified individuals with known disabilities and employees whose work requirements interfere with a religious belief unless doing so would result in an undue hardship to the Company or cause direct threat to health or safety.

In support of our equal employment opportunity principle, Goodwill of Colorado has developed written affirmative action plans for women, minorities, individuals with disabilities, and covered veterans. Goodwill of Colorado's EEO/AA coordinator is Jill Alderton, at the Company's facility located at 1460 Garden of the Gods Road, Colorado Springs, CO 80907 (719) 635-4483. She is responsible for compliance with state and federal EEO laws and affirmative action regulations. Mrs. Alderton is also responsible for implementing the Goodwill of Colorado's affirmative action plan, including equal employment practices, monitoring, and internal reporting. If you believe you have not been treated in accordance with this policy, please contact the EEO Officer. Our plan for Veterans and the Disabled is available to you in her office during regular office hours by appointment. All employees and applicants for employment are protected, by both Goodwill of Colorado policy and equal employment opportunity/affirmative action regulations and law, from coercion, intimidation, interference, or discrimination for filing a complaint or assisting in an investigation.

Sexual Harassment

Goodwill of Colorado strongly opposes sexual harassment and inappropriate sexual conduct. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when:

- Submission to such conduct is made explicitly or implicitly a term or condition of employment.
- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment.
 - Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

All employees are expected to conduct themselves in a professional and businesslike manner at all times. Conduct which may violate this policy includes, but is not limited to, sexually implicit or explicit communications whether in:

- Written form, such as cartoons, posters, calendars, notes, letters, e-mails.

- Verbal form, such as comments, jokes, foul or obscene language of a sexual nature, gossiping or questions about another’s sex life, or repeated unwanted requests for dates.
- Physical gestures and other nonverbal behavior, such as unwelcome touching, grabbing, fondling, kissing, massaging, and brushing up against another’s body.

Pay Transparency Nondiscrimination Provision

Goodwill of Colorado will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor’s legal duty to furnish information. 41 CFR 60-1.35(c)

Complaint Procedure

If you believe there has been a violation of the EEO policy or harassment based on the protected classes listed above, including sexual harassment, please use the following complaint procedure. Goodwill of Colorado expects employees to make a timely complaint to enable the Company to investigate and correct any behavior that may be in violation of this policy.

Report the incident to your supervisor or a member of the Human Resources team such as:

- Employee Relations Specialist, Liz Brumette at lbrumette@goodwilldenver.org
- Employee Relations Specialist, Ralph Cruz at rcruz@discovermygoodwill.org
- EEO Coordinator/HR Director, Jill Alderton at jalderton@discovermygoodwill.org
- EEO Officer/VP of Human Resources, Gary Smith at gsmith@discovermygoodwill.org

The appropriate individual will investigate the matter and take corrective action. Your complaint will be kept as confidential as practicable. If you prefer not to go to any of these individuals with your complaint, you should report the incident to the EthicsPoint hotline at **888-291-7589** or www.ethicspoint.com, or by using the EthicsPoint link found on Goodwill’s website home page.

Goodwill of Colorado prohibits retaliation against any employee for filing a complaint under this policy or for assisting in a complaint investigation. If you believe there has been a violation of our EEO or retaliation standard, please follow the complaint procedure contained in the sexual harassment policy.

If the Company determines that an employee’s behavior is in violation of this policy, disciplinary action will be taken, up to and including termination of employment.



Karla Grazier
President/CEO



Gary Smith
Vice President, Human Resources/Organizational Development

Reviewed and Approved: _____ 2020 _____ 2021 _____ 2022 _____ 2023

Attachment: EEO Policy Statement to All Employees and Applicants (available on JOBS page and EE Handbook)