

# GOODWILL OF COLORADO

Policy 45-43

Revised July 2024

## HUMAN RESOURCES

### **Equal Employment Opportunity & Anti-Harassment**

#### 1. PURPOSE

Goodwill of Colorado is dedicated to the principles of Equal Employment Opportunity. Goodwill prohibits unlawful discrimination against job applicants or employees on the basis of age (40 and over), color, disability, sex/sexual orientation (including gender identity, gender expression, transgender status, sexual orientation, pregnancy, childbirth, or related conditions), genetic information (including family medical history), military or veteran status, national origin/ancestry, citizenship, race (including traits historically associated with race, such as hair texture and length, protective hairstyles), religion, marital status, familial status, 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.

Goodwill of Colorado will provide reasonable accommodations for qualified individuals with known disabilities unless doing so would result in undue hardship to the company or cause a direct threat to health or safety. The company will provide reasonable accommodation for employees whose work requirements interfere with a religious belief, unless doing so poses undue hardship on the company.

Requests for a reasonable accommodation can be sent to [ada@goodwillcolorado.org](mailto:ada@goodwillcolorado.org)

#### 2. GENERAL

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 and can be reached via email at [JAlderton@GoodwillColorado.org](mailto:JAlderton@GoodwillColorado.org) or by phone at (719) 635-4483. Mrs. Alderton is responsible for compliance with state and federal EEO laws and Affirmative Action regulations. Mrs. Alderton is also responsible for implementing 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 Mrs. Alderton. Our plan for Veterans and the Disabled is available to you in her office 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.

### 3. SEXUAL HARASSMENT

- a. 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 physical, verbal, or visual conduct based on gender constitute sexual harassment when:
  - i. Submission to the conduct or communication is explicitly or implicit term or condition of employment; or
  - ii. Submission, objection, or rejection of the conduct or communication is used as the basis for an employment decision; or
  - iii. Such conduct or communication has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.
- b. All employees are expected to always conduct themselves in a professional and business-like manner. Any conduct that may violate this policy includes, but is not limited to, sexually implicit or explicit communications whether in:
  - i. Written form, such as cartoons, posters, calendars, notes, letters, e-mails, etc.
  - ii. Verbal forms, 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.
  - iii. Physical gestures and other nonverbal behavior, such as unwelcome touching, grabbing, fondling, kissing, massaging, and brushing up against another's body.

### 4. 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\(c\)](#)

### 5. COMPLAINT PROCEDURE

- a. 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.

- b. Report the incident to your supervisor or a member of the Human Resources team via email at:
  - i. Employee Relations Team at [EmployeeRelations@GoodwillColorado.org](mailto:EmployeeRelations@GoodwillColorado.org)
  - ii. Director, Human Resources Ralph Cruz at [RCruz@GoodwillColorado.org](mailto:RCruz@GoodwillColorado.org)
  - iii. Manager, Human Resources Michelle Pettit at [MPettit@GoodwillColorado.org](mailto:MPettit@GoodwillColorado.org)
  - iv. EEO Coordinator/Sr. Director, Human Resources Jill Alderton at [JAlderton@GoodwillColorado.org](mailto:JAlderton@GoodwillColorado.org)
  - v. EEO Officer/CMO of Human Resources, Gary Smith at [GSmith@GoodwillColorado.org](mailto:GSmith@GoodwillColorado.org)
- c. The appropriate individual will investigate the matter and take appropriate 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 [EthicsPoint.com](http://EthicsPoint.com) or by using the EthicsPoint link found on [Goodwill’s Employee Links and Resources webpage](#).
- d. 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*

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Karla Grazier  
President/CEO

*Jill Alderton*

Jill Alderton (Jul 29, 2024 08:39 MDT)

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Jill Alderton  
Sr. Director, Human Resources

Attachments:

Attachment 1: EEO Policy Statement to All Employees and Applicants (available on Goodwill of Colorado’s website JOBS page and New Hire Onboarding Packet)

Attachment 2 – EEOC Know Your Rights (English and Spanish) - 2024

Attachment 3 – Pay Transparency Nondiscrimination Provision (English and Spanish) - 2024

Reviewed and Approved:     *JCA*     2024 \_\_\_\_\_ 2025 \_\_\_\_\_ 2026 \_\_\_\_\_ 2027 \_\_\_\_\_









# 45-43 EEO Anti-Harassment Policy

Final Audit Report

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