

## **Equal Employment Opportunity and Affirmative Action**

Based on our core values, Goodwill of Greater Washington (GGW) will seek to ensure that management and Team Members act responsibly and with sensitivity to the cultural diversity among its staff. GGW is committed to an employment policy prohibiting discriminatory practices in every condition of employment including on the basis of race, age, color, religion, gender or expression of gender identity, national origin, political affiliation, disability, matriculation, personal appearance, sexual orientation, family responsibilities, familial status, veteran status, marital status, pregnancy, childbirth, genetic background, or any other legally protected characteristic. GGW is committed to promoting affirmative action for women, minorities, veterans, persons with disabilities and any other category as prescribed by law. GGW prohibits any form of harassment, retaliation, intimidation, threats, coercion or discrimination against any Team Member or applicant who may engage in any protected activities.

GGW will not discharge or in any other manner discriminate against Team Members or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another Team Member or applicant. However, Team Members who have access to the compensation information of other Team Members or applicants as a part of their essential job functions cannot disclose the pay of other Team Members or applicants to individuals who do not otherwise have access to that 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 GGW, (c) consistent with GGW's legal duty to furnish information, or (d) necessary for the performance of the Team Member's job duties at GGW.

GGW is committed to an employment policy prohibiting discriminatory practices in every condition of employment and promoting affirmative action for women, minorities, veterans, persons with disabilities and any other category as prescribed by law. Because of this commitment, GGW has developed an Affirmative Action Plan. The Plan has been developed in accordance with the following laws (as amended): Civil Rights Act of 1964, the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Genetic Information Nondiscrimination Act of 2008, and Executive Order 11246. The Plan, the principals behind it and the procedures delineated in this policy, applies to all matters of recruitment and employment including employment agencies and advertising, compensation and opportunities for advancement, upgrading, promotions, demotions, transfers, selection for training, work assignment and termination of employment. The Plan is applicable to all exempt, nonexempt, salaried, hourly, full-time and part-time positions.

It is GGW's full intention to ensure that recruiting efforts are open to a diverse group of candidates; that all aspects of GGW personnel policies, programs, practices, and

operations are applied equally to all Team Members; and that training and the possibility of advancement are open to all wishing to make investments in their careers without regard to race, age, color, religion, gender or expression of gender identity, national origin, political affiliation, disability, matriculation, personal appearance, sexual orientation, family responsibilities, familial status, veteran status, marital status, pregnancy, childbirth, genetic background, or any other legally protected characteristic.

### **Plan Monitoring:**

To assure compliance with the Plan and EEO regulations, a member of the People and Culture Team will be specifically named and appointed as the Equal Opportunity and Affirmative Action Officer. As such, the Officer will administer and monitor the Plan and diversity initiatives and make periodic reports to the President and CEO.

### **Dissemination of Information:**

As a condition of employment, each Team Member of GGW is required to comply with the Plan. In an effort to inform Team Members of and ensure compliance with the Plan, each Team Member is required to acknowledge receipt of the Team Member Handbook. Specific details regarding implementation of the Plan are made available to Team Members through the People and Culture Team, and more specifically, through the Equal Opportunity and Affirmative Action Officer.

Managers and Supervisors are provided with periodic training on GGW personnel policies regarding the Plan and any other regulations that may affect GGW employment policies or procedures.

### **Protected Activities**

GGW prohibits any form of harassment, retaliation, intimidation, threats, coercion or discrimination against any Team Member or applicant who may engage in any of the following protected activities:

- Filing a complaint;
- Assisting with or participating in an investigation, compliance review, hearing or any other related activity particularly with relation to the administration of Section 503 of the Rehabilitation Act of 1973, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974 ("VEVRAA"), or any other federal, state or local law requiring equal opportunity for disabled persons or protected veterans;
- Opposing any act or practice made unlawful by Section 503, VEVRAA or their regulations or any other federal, state or local law requiring equal opportunity for persons with disabilities or protected veterans; and
- Exercising any other right protected by Section 503, VEVRAA or their implementing regulations.

## **Pay Transparency Policy Statement**

GGW will not discharge or in any other manner discriminate against Team Members or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another Team Member or applicant. However, Team Members who have access to the compensation information of other Team Members or applicants as a part of their essential job functions cannot disclose the pay of other Team Members 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 GGW, or (c) consistent with GGW's legal duty to furnish information.

## **Drug-Free Workplace Policy**

### **Introduction**

GGW prohibits the use, possession, distribution, transportation or sale of alcoholic beverages or drugs by Team Members (other than those prescribed by a physician or sold over-the-counter and are not illegal under federal law) on its premises at any time or while representing GGW's interest, including driving for business purposes while under the influence of drugs or alcohol.

### **Covered Workers**

This policy covers all GGW Team Members, contractors, consultants, volunteers, interns, and job applicants. Additional provisions of GGW's Drug-Free Workplace program that apply only to Team Members who drive semi-tractors for GGW are contained in GGW's Transportation and Fleet Safety Manual.

### **Prohibited Behavior**

It is a violation of GGW's drug-free workplace policy to bring, have possession of, have present in the body, be under the influence of, consume, distribute, or attempt to distribute, manufacture, sell, trade, and/or offer to sell drugs illegal under federal law or intoxicants on company premises, property or job site. Prescription and over-the-counter drugs that do not violate federal law are not prohibited when taken according to a physician's direction. Any Team Member taking prescribed or over-the-counter medications will be responsible for consulting the prescribing physician and/or pharmacist to ascertain whether the medication may interfere with safe performance of his or her job. If the use of a medication would compromise the safety of the Team Member, fellow Team Members, or the public, it is the Team Member's responsibility to use appropriate procedures (e.g., call in sick, use leave, request change of duty, notify supervisor) to avoid unsafe workplace practices. GGW reserves the right to require Team Members to provide information related to the safety of prescribed medications while the Team Member is working.

## **Notification of Drug-Related Convictions**

Any Team Member who is convicted of a criminal drug statute must notify the People and Culture Team in writing within five (5) days of the conviction. Conviction means a guilty finding (including a plea of no contest) or imposition of sentences, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes.

If a Team Member works at a federal government contract site and is convicted of a criminal drug statute while working on the contract site, the GGW VP of Contracts will provide written notice of the conviction to the contracting officer for the site at which the Team Member works within 10 days after receiving notice of the conviction. The notice to the contracting officer shall include the position title of the Team Member.

## **Drug Screening**

As a condition of employment, GGW requires that Team Members adhere to this policy. All new hires are required to pass a drug screening prior to employment. GGW may, at its discretion, require all Team Members to submit to drug and alcohol testing, by a person or agency designated by GGW at GGW's expense. Such examinations can include, but are not limited to, blood, urine, breath, or other tests for evidence of the presence of alcohol, drugs, perception-altering or other substances in the body. Substances that may be tested for include, but will not be limited to amphetamines, cannabinoids, cocaine, opiates, phencyclidine (PCP), marijuana, and alcohol for .08 or higher blood alcohol concentration. Team Members who operate machinery or perform other safety sensitive work must not test above .04 or higher blood alcohol concentration, or .02 or higher for those who drive semi-tractors for GGW.

Any Team Member who tests positive for illegal drugs and/or alcohol will be disciplined immediately. Marijuana usage, even if prescribed medicinally, is a violation of GGW's drug free workplace policy. An Team Member will be subject to the same consequences of a positive test if he or she refuses the screening or the test, adulterates or dilutes the specimen, substitutes the specimen with that from another person, or sends someone else for testing. Refusal to sign the required forms or to cooperate in the testing process in such a way that prevents completion of the test will be treated as a positive test.

## **Post-Incident Drug Screening**

Team Members who are involved in a work-related incident requiring medical attention may be subject to post-incident drug screening, in accordance with applicable law.

## **Random Drug Screening**

Team Members working in particular positions or programs may be subject to random drug and alcohol screening during their employment with GGW. At the time of publishing this handbook, those subject to random testing are GGW Excel Center Team Members

and Team Members employed to drive semi-tractors in GGW's Transportation Team. Positions or programs included in the random drug-testing program are subject to change with notice from the People and Culture Team or the President & CEO.

### **Searches**

If an Team Member is suspected of violating the drug-free workplace policy, he or she may be asked to submit to a search or inspection at any time. GGW may search company property and personal effects on the company's premises when there is reasonable suspicion that any aspect of this policy has been violated. Searches can be conducted of pockets and clothing, lockers, wallets, purses, briefcases, personal boxes and bags, desks, work stations and vehicles while on GGW property or place of business. A refusal to submit to a reasonable search or alcohol or drug test, or the intentional interference with a search or test, may result in termination of employment.

### **Reasonable Suspicion**

If GGW has reasonable cause to believe that an individual's judgment, coordination or other senses are impaired to the extent that he or she poses a threat to the safety or security of other individuals or property, GGW may refuse to allow the Team Member to continue to work pending further investigation. In such cases GGW reserves the right to request the Team Member to submit to drug/alcohol testing.

### **Consequences**

Violation of the drug and alcohol free workplace policy may result in probation, suspension or immediate termination of employment. In the case of applicants, the offer of employment may be withdrawn. In the case of new hires any positive test within the first 90 days of employment will result in immediate termination. If a Team Member who has been with GGW more than 90 days tests positive for drugs or alcohol, the Team Member typically will be placed on 30 days unpaid leave. During this 30 day period, the Team Member must seek treatment and must provide written proof to the People and Culture Manager of active participation in a drug or alcohol treatment program to remain employed. Failure to seek treatment during the period of unpaid leave and/or failure to provide written proof of active drug treatment at the end of 30 days will result in termination. Please note that fewer than two (2) full weeks of treatment is insufficient to show proof of active participation. The Team Member will then be retested in 30 days. If the Team Member tests positive a second time, he/she will be terminated immediately. If the Team Member tests negative, he/she will be reinstated to active status and allowed to return to work immediately. Team Members who self-report substance abuse while on the job are subject to the same consequences as mentioned above.

### **Assistance**

GGW recognizes that drug and alcohol abuse are treatable illnesses. Team Members are encouraged to voluntarily seek professional help with alcohol and drug problems through their health care provider. Treatment for these disorders may be covered by

GGW's group health insurance. Team Members should review their plan option to determine the level of assistance, if any, that is provided. A list of treatment programs is available through the Employee Assistance Program (EAP).

### **Confidentiality**

All information received by the organization through the drug-free workplace program is confidential. Access to this information is limited to those who have a legitimate need to know, subject to applicable laws and GGW policies.

### **Shared Responsibility**

A safe and productive drug and alcohol-free workplace is achieved through cooperation and shared responsibility. Both Team Members and management have important roles to play. Team Members are encouraged to be concerned about working in a safe environment, support fellow workers in seeking help and report dangerous behavior to their supervisors. It is the supervisor's responsibility to observe Team Member performance, investigate reports of dangerous practices, document negative changes and problem performance and counsel Team Members as to expected performance improvement.

### **Storing Prescribed Medication at the Workplace**

It is GGW's policy not to have prescribed medication or over the counter drugs stored or kept in any common area at the worksite. Common areas include, but are not limited to refrigerators, cabinets, drawers or in break rooms. Team Members with chronic medical conditions requiring the use of prescribed medication during work hours must keep the prescribed medication in a secure location such as in the Team Member's locker, on one's person, or in accordance with any rules specific to the Team Members work site. Prescribed medication that must be refrigerated should be stored in an insulated freezer pack or similar container inside the Team Member's locker. It is the Team Member's responsibility to take reasonable care for the health and safety of others and to cooperate with GGW and its efforts to provide a safe workplace. Prescribed medication that violates federal law is prohibited on GGW worksites.

### **Exceptions**

Moderate and responsible consumption of alcoholic beverages is permitted in the following situations: at company functions or at functions off the premises while representing the company where alcoholic beverages are being served; in a place of public accommodation while engaged in business entertaining; or private off-duty time after the close of business when traveling for the company. Except for the previously stated exceptions, any violation of this policy may result in termination of employment.

### **Harassment Free Workplace**

## Introduction

Goodwill of Greater Washington (GGW) strives to maintain an environment free of any form of workplace harassment. It is against GGW policy for any Team Member, contractor, client, or vendor to harass any GGW Team Member or non-Team Member on the basis of race, age, color, religion, gender or expression of identity, national origin, political affiliation, disability, matriculation, personal appearance, sexual orientation, family responsibilities, familial status, veteran status, marital status, pregnancy, childbirth, genetic background, or any other legally protected characteristic.

## Types and Definitions of Harassment

Harassment is behavior that has the purpose or effect of creating an intimidating, hostile, or offensive working environment; has the purpose or effect of unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment opportunities. Harassment may take many forms including, but not limited to:

- 1) **Verbal Harassment:** innuendoes, suggestive comments, jokes of a sexual, ethnic, genetic, race-based or religious nature; sexual propositions, advances or threats; subtle or overt pressure for sexual favors; inappropriate comments about an individual's body or appearance; unwelcome comments; or personal inquiries into a person's private life.
- 2) **Non-Verbal Harassment:** displays of offensive objects or pictures, e-mails, websites, gestures, lingering, or suggestive bodily movements or stares; and
- 3) **Physical Harassment:** unwanted contact including touching, pinching, brushing against the body, pushing, hitting or throwing objects, or any other unwanted physical contact.

## Reporting Procedures

Any Team Member who believes he or she is being harassed should advise the person they believe is harassing them promptly that his or her behavior is unwelcome and request that it be discontinued immediately. Whether or not a Team Member who believes he or she is being harassed talks directly to the person who they believe is harassing them, he or she should report such offending behavior immediately to his or her supervisor or the People and Culture Team, or the Corporate Compliance Officer. The Team Member may bypass his or her supervisor if the Team Member is uncomfortable reporting the harassment to the supervisor. Any Team Member who believes he or she has witnessed harassment should immediately report the matter to his or her supervisor and to the People and Culture Team.

## Management Responsibility

Misconduct involving harassing behavior will be dealt with appropriately and promptly. Any manager who receives a complaint of harassment or inappropriate behavior on the part of or from any Team Member, vendor or contractor involving a GGW associate, or

who has reason to suspect harassment may be occurring, is obligated to immediately notify the People and Culture Team. GW will promptly and thoroughly investigate the facts and circumstances of all harassment claims.

### **Confidentiality**

GW will maintain the confidentiality of such complaints to the maximum extent practicable. Investigation of such complaints may require disclosure to the accused party and other witnesses for gathering pertinent facts.

### **Consequences**

When the organization completes the investigation and a determination is made regarding the alleged harassment, the parties involved will be timely informed of the results. All Team Members, regardless of position or title, will be subject to discipline up to and including discharge if the organization determines that a Team Member has engaged in harassment in violation of this policy.

### **Non-Retaliation**

No retaliatory measures will be taken against a Team Member who complains of or reports harassment or participates in an investigation. Any individual found to have engaged in retaliatory behavior may be disciplined up to and including termination.

## **Grievance Policy**

### **Introduction**

GW provides all Team Members a method to handle and resolve complaints and grievances quickly and internally. The grievance process is an internal management tool created to assist the Team Member in resolving conflicts with the organization. All conferences with the Team Member are conducted in private and in confidence.

### **Eligibility**

Team Members who have completed ninety (90) calendar days of employment and have successfully completed their initial employment period may use the grievance procedure.

### **Grievable Concerns**

Team Members may register complaints or problems concerning working conditions, the interpretation or application of policies and procedures, a disciplinary action, or other matters related to their employment.

### **Non-Grievable Concerns**

The following are not subject to this grievance policy and procedure unless there is evidence of an unlawful act: an action caused by a reduction in workforce or the termination of a Team Member; a non-selection for promotion when the sole basis for the grievance is an allegation by the associate that he or she is better qualified than the



person selected; rate of pay; performance appraisals; initial employment period review; probationary period review; Team Member benefits; and position classifications.

### **Procedures**

The Team Member should begin by discussing the problem with his or her supervisor. If the grievance is unresolved after three (3) working days, the Team Member should contact the next level supervisor. If the grievance remains unresolved three (3) working days, the Team Member should contact the Chief People and Culture Officer, who will then hear the grievance and take the necessary measures to resolve it. This may involve the review and evaluation of the grievance through discussion with the Team Member (complainant) and may involve obtaining statements from witnesses or other persons. After a full review, the Chief People and Culture Officer will issue a written recommendation to the Corporate Compliance Officer, President and CEO, to the Team Member(s) involved, and to the supervisor(s). Failure by the Team Member (complainant) to comply with the procedures set forth herein may result in dismissal of the complaint.

No associate will be retaliated against for filing a grievance or participating in the grievance process. Nothing in this policy shall alter a Team Member's employment-atwill status with GGW.

### **Open Door Policy**

The People and Culture Team is always open to all Team Members. If a Team Member has a problem or concern and is not satisfied with the answer or solution offered by his or her immediate supervisor, the Team Member should speak with the People and Culture Team.

### **Whistleblower Policy**

Goodwill of Greater Washington (GGW) is committed to an organizational culture characterized by openness, integrity, responsibility, and accountability. This commitment means that all GGW directors, officers, and Team Members must meet the highest ethical standards and comply at all times with both the letter and spirit of all laws and regulations applicable to GGW. The GGW "tip line" can be used to leave a confidential message (that may be anonymous or not) reporting a prohibited act. The "tip line" is monitored by the Corporate Compliance Officer. The "tip line" number is: 202-715-2655. Any GGW Team Member who retaliates against another individual who in good faith reports or raises issues or concerns related to a possible Prohibited Act may be subject

to appropriate remedial and/or disciplinary measures up to and including termination of employment.

All GGW directors, officers, and team members are expected to meet appropriate ethical standards in their undertakings and comply with:

- all laws and regulations applicable to Goodwill (collectively "Law");
- Goodwill's Code of Conduct and related Policies (collectively "Code");
- Goodwill's Conflict of Interests Policy; and
- Goodwill's Team Member Handbook

as each may be amended from time to time. Collectively, the above are referred to in this Policy as the "Governing Rules."

### **Prohibited Acts**

In order to meet this commitment, team members must immediately report if they observe, experience, or learn of a possible Prohibited Act, which for purposes of this Policy is any improper act, omission, or conduct that constitutes:

- any violation of the Governing Rules; or
- any matter involving impropriety in accounting, internal accounting controls, or auditing matter.

Team members must immediately report a possible Prohibited Act – even if it may appear that such act, omission, or conduct is helping to achieve a Goodwill goal or objective. All Goodwill goals and objectives are premised on their being achieved only in a manner consistent with the highest level of ethical conduct and in compliance with the Governing Rules.

A team member's failure to report a possible Prohibited Act could:

- allow the act, omission, or conduct to continue unaddressed;
- undermine Goodwill's ability to achieve its vision and/or mission;
- create a loss of confidence in Goodwill for team members, Goodwill's partners and stakeholders, and the public at large; and
- result in the assessment of fines, damages, and other financial penalties against Goodwill and potential civil and criminal liability for its employees.

Therefore, the failure to report a possible Prohibited Act violates this Policy and may result in remedial and/or disciplinary measures up to and including termination of employment.

## Reporting Prohibited Acts

Goodwill encourages directors, officers, and team members to raise concerns about possible Prohibited Acts first within their own supervisory chain. However, if a team member is not comfortable speaking with his/her supervisor or is not satisfied with his/her supervisor's response, the team member is encouraged to speak with someone on the People & Culture Team or with any member of the Senior Leadership Team that the team member is comfortable approaching.

A team member may also report a possible Prohibited Act to Goodwill's Corporate Compliance Officer. If desired, any such report may be made anonymously either in writing to:

General Counsel/Corporate Compliance Officer  
Goodwill of Greater Washington  
1140 3<sup>rd</sup> Street, NE, Suite 350 Washington,  
DC 20002

Or, by phone to 202-719-1235.

The Goodwill "tip line" can be used to leave a confidential message (that is anonymous or not) reporting a prohibited act. The "tip line" is monitored by the Corporate Compliance Officer.

The "tip line" number is: 202-715-2655.

If a team member's report of a possible Prohibited Acts has reached the President & CEO and the team member is not satisfied with the response of the President & CEO, the team member may report the matter to the Chair, Governance Committee of Goodwill's Board of Directors. The name and contact information for the Chair, Governance Committee can be obtained from the President & CEO or the General Counsel/Corporate Compliance Officer. The name and information to enable a team member to contact the Chair, Governance Committee can also be found on Goodwill's website ([www.dcgoodwill.org](http://www.dcgoodwill.org)).

Any manager, officer, or director who receives any information about a possible Prohibited Act must report it promptly to the Corporate Compliance Officer.

The Corporate Compliance Officer, with the assistance of persons s/he may designate, shall be responsible for investigating and resolving all reported complaints and allegations concerning violations of the Governing Rules. Within five business days of his/her receipt of such report, the Corporate Compliance Officer or his/her designee will begin an investigation and confirm to the person who initiated the matter that s/he has received the report. All attempts will be made to conclude the investigation with 30 days of the matter being reported. As appropriate, the Corporate Compliance Officer shall advise the President & CEO, the Chairman of the Board, and/or the Board of Directors.

All reports will be treated confidentially, consistent with Goodwill's need to conduct an adequate investigation, implement any remedial measures, and fulfill legal or regulatory obligations.

Anyone who raises a concern about a possible Prohibited Act must act in good faith and have reasonable grounds for believing that the information disclosed indicates such an Act. The raising of any allegation that is (i) not substantiated *and* (ii) made maliciously, with knowledge that it is not true, or with reckless disregard for its truth, will be viewed as a serious disciplinary offense.

### **Open Working Environment**

As an organization established and committed to promote the public interest, Goodwill strives to maintain a culture of "doing the right thing" at all times, consistent with the highest ethical standards. To that end, Goodwill requires each of its managers to create and maintain an open working environment that invites and entertains discussion on a wide range of issues relevant to Goodwill's operations and compliance with the Governing Rules.

### **Non-Retaliation**

Goodwill strictly prohibits retaliation against any individual who in good faith (1) reports or raises issues or concerns related to a possible Prohibited Act or (2) files an internal or external complaint or charge related to a possible Prohibited Act. Goodwill likewise prohibits retaliation against any individual for participating or cooperating in good faith in an internal or external investigation, hearing, or proceeding involving any such complaint or charge.

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within Goodwill prior to seeking resolution outside Goodwill.

Any Goodwill employee who retaliates against another individual who in good faith reports or raises issues or concerns related to a possible Prohibited Act may be subject to appropriate remedial and/or disciplinary measures up to and including termination of employment and possibly civil and/or criminal liability. This non-retaliation policy is designed to assure all directors, officers, and team members that Goodwill encourages and relies on their open and frank communication of genuinely held concerns about possible Prohibited Acts, regardless of how these are reported or raised.