

## **Equal Employment Opportunity Policy on Workplace Discrimination, Harassment and Retaliation**

The Presidio Trust (“Trust”) is committed to a policy of equal employment opportunity and to providing a workplace that is free from unlawful discrimination, harassment or retaliation. In order to further that commitment, it is the policy of the Trust to make all employment- related decisions without regard to race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, age (40 or older), disability or genetic information (including family medical history). All officers, directors, employees, or any other agents of the Trust, regardless of position or title, will be subject to discipline, up to and including discharge, should the Trust determine that any such person has engaged in unlawful discrimination, harassment, or retaliation against another person in violation of this policy.

**a. The Trust Will Not Tolerate Discrimination.** It is the Trust’s policy to recruit, hire, train, promote and administer all personnel actions without regard to any of the attributes mentioned above. The Trust will not tolerate any unlawful discrimination, and any such conduct is prohibited. The Trust will not condone or tolerate the discrimination of its employees by their co-workers, supervisors, third parties (including clients, vendors and independent contractors) or any person or entity under the Trust’s direction or control.

**b. The Trust Will Not Tolerate Harassment.** The Trust also prohibits any harassment based on any of the attributes mentioned above. For example, the Trust will not tolerate racial slurs, jokes, threats or intimidation or any similar verbal or physical conduct that denigrates or shows hostility or aversion towards an individual because of the individual’s race, ethnicity, national origin or any other protected classification.

**c. The Trust Will Not Tolerate Sexual Harassment.** Sexual harassment of the same or opposite sex is also prohibited. Sexual harassment includes any unwelcome or unwanted conduct of a sexual nature (verbal or physical) when: (1) submission to such conduct is a term or condition of a person’s employment; (2) submission to or rejection of this conduct by an individual is used as a factor in decisions affecting hiring, evaluation, promotion or other aspects of employment; or (3) this conduct substantially interferes with an individual’s employment or creates an intimidating, hostile or offensive work environment.

Examples of unacceptable conduct include, but are not limited to:

- (1) threats or promises of benefits in exchange for sexual favors;
- (2) unwelcome sexual jokes, flirtations, advances or propositions or obscene comments or gestures;
- (3) graphic or verbal commentary or abuse about an individual’s body, dress, sexual prowess, sexual deficiencies or of any sexual nature, or the use of sexually degrading words or gestures to describe an individual;
- (4) unwelcome or suggestive touching, leering, whistling, pinching or insulting; or

- (5) the display of sexually suggestive objects or pictures, including photographs, drawings or cartoons.

These types of behavior are unacceptable at the Trust's offices or work sites, in other work settings, such as business trips or at client locations, or at business-related social events. All Trust employees have a responsibility for keeping the work environment free of discrimination and harassment.

**d. The Trust Will Not Tolerate Retaliation.** It is the Trust's policy to prohibit any form of discipline or retaliation for reporting any incident of discrimination or harassment, pursuing any claim of discrimination or harassment, or otherwise participating or cooperating in any investigation of an incident of discrimination or harassment. Retaliation is a serious violation of the Trust's equal employment opportunity policy, and it should be reported immediately. Any person found to have retaliated against another individual for reporting actual or alleged discrimination or harassment will be subject to disciplinary action, up to and including discharge. Conversely, any individual who intentionally makes a false claim of discrimination or harassment will be subject to discipline, up to and including discharge.

**e. Reporting Discrimination, Harassment or Retaliation.** Any incident or situation that an employee believes involves prohibited discrimination, harassment or retaliation, by an officer, director, supervisor, employee or other individual must be brought to the immediate attention of the Trust's Equal Employment Opportunity Officer. If the Equal Employment Opportunity Officer receives an allegation of discrimination, harassment or retaliation, the Trust will conduct an investigation and, if appropriate, take remedial action.

This policy is not intended by the Trust, nor should it be construed, to create any guarantees that employment with the Trust will continue for any specified period of time or end only under certain conditions. In addition, nothing in this policy constitutes either an express or implied contract that the policy or its procedures will remain unchanged. The Trust reserves the right to create, modify or eliminate any policy or procedure without advance notice. Employment with the Trust is a voluntary "at-will" relationship for no fixed period of time. It is the employee's right, as well as the Trust's right, to terminate the employment relationship at any time, for any reason, and without advance notice.