



## **Policy Against Unlawful Harassment, Discrimination, and Retaliation**

Imaginable Futures is committed to providing a work environment that is free of unlawful harassment, discrimination, and retaliation. Further to this commitment, we strictly prohibit all forms of unlawful discrimination and harassment, which includes discrimination and harassment on the basis of race, religion, color, sex, pregnancy (including breast feeding and related medical conditions), national origin, citizenship status, uniform service member status, age, genetic information, disability, and for employees of Imaginable Futures working in California, ancestry, ethnicity, gender identity and expression, sexual orientation, marital status, protected medical condition, or any other category protected by applicable state or federal law.

This policy against unlawful harassment, discrimination, and retaliation applies to all employees of Imaginable Futures, including managers, as well as to consultants and unpaid interns and volunteers. We prohibit managers and employees of Imaginable Futures from harassing co-workers as well as our customers, vendors, suppliers, independent contractors and others doing business with Imaginable Futures. Any such harassment will subject an employee to disciplinary action, up to and including immediate termination. In addition, we prohibit our customers, vendors, suppliers, independent contractors and others doing business with us from harassing our employees of Imaginable Futures.

**Examples of What Constitutes Prohibited Harassment:** Imaginable Futures strictly prohibits harassment concerning race, color, religion, national origin, age or other protected characteristic. By way of illustration only, and not limitation, prohibited harassment concerning race, color, religion, national origin, age or other protected characteristic includes:

- slurs, epithets, and any other offensive remarks;
- joking, mocking, or ridiculing conduct, whether written, verbal, or electronic;
- threats, intimidation, horseplay, and other menacing behavior;
- other verbal, graphic, or physical conduct; and
- other conduct predicated upon one or more of the protected categories identified in this policy.

**Examples of Prohibited Sexual Harassment:** Sexual harassment includes a broad spectrum of conduct, including harassment based on sex, gender, gender transition, gender identity or expression, and sexual orientation. By way of illustration only, and not limitation, some examples of unlawful and unacceptable behavior include:

- unwanted sexual advances;
- offering an employment benefit (such as a raise or promotion or assistance with one's career) in exchange for sexual favors, or threatening an employment detriment (such as termination, demotion, or disciplinary action) for an employee's failure to engage in sexual activity;
- visual conduct, such as leering, making sexual gestures, displaying sexually suggestive objects or images, cartoons or posters;
- verbal sexual advances, propositions, requests or comments;
- sending sexually-related text-messages, emails, videos or images via social media;
- verbal abuse of a sexual nature, graphic verbal commentaries about an individual's appearance, sexually degrading words used to describe an individual, suggestive or obscene letters, notes or invitations; and
- unwanted physical conduct, such as touching, kissing, groping, assault, impeding or blocking movement;
- physical or verbal abuse concerning an individual's gender, gender transition, gender identity, or gender expression; and
- verbal abuse concerning a person's characteristics such as pitch of voice, facial hair or the size or shape of a person's body, including remarks that a male is too feminine or a woman is too masculine.

If you have any questions about what constitutes prohibited harassing behavior, ask your manager or the Global Head of People.

**Prohibition Against Retaliation:** Imaginable Futures is committed to prohibiting retaliation against those who themselves or whose family members report, oppose, or participate in an investigation of alleged unlawful harassment, discrimination, or other wrongdoing in the workplace. By way of example only, participating in such an investigation includes, but is not limited to:

- Filing a complaint with a federal or state enforcement or administrative agency;
- Participating in or cooperating with a federal or state enforcement agency conducting an investigation of Imaginable Futures regarding alleged unlawful activity;
- Testifying as a party, witness, or accused regarding alleged unlawful activity;
- Making or filing an internal complaint with Imaginable Futures regarding alleged unlawful activity;
- Providing notice to Imaginable Futures regarding alleged unlawful activity;
- Assisting another employee who is engaged in any of these activities.

Imaginable Futures is further committed to prohibiting retaliation against qualified employees of Imaginable Futures who request a reasonable accommodation for any known physical or mental disability, as well as employees of Imaginable Futures who request a reasonable accommodation of their religious beliefs and practices. In addition, Imaginable Futures will not penalize or retaliate against an employee who is a victim of domestic violence, sexual assault, or stalking for requesting leave time or changes in the workplace to ensure the employee's safety and well-being.

## **What Should You Do If You Feel You or Others Are Being, Or Have Been, Harassed, Discriminated Against, or Retaliated Against, or Observe Others**

Anyone wishing to make a formal complaint about harassment or retaliation should submit it in writing to the Head of People, whose role is to achieve a solution wherever possible and to respect the confidentiality of all concerned. If the matter concerns that person, you should refer it to the Global Head of Legal.

If you observe harassment by another employee, manager or non-employee, please report the incident immediately to the Head of People. Appropriate action will also be taken in response to violation of this policy by any non-employee.

In addition, reports can be made anonymously through EthicsPoint here, maintained by The Omidyar Group: <https://secure.ethicspoint.com/domain/media/en/gui/22951/index.html>.

Regardless of whether a formal complaint has been lodged, we have a duty to protect all staff and may pursue the matter independently if, given the totality of the circumstances, we consider it appropriate to do so.

### **Response to Allegations**

Your notification of the problem is essential to us. We cannot help resolve a harassment problem unless we know about it. Therefore, concerns and/or problems must be brought to our attention by staff so that we can take whatever steps are necessary to address the situation. Imaginable Futures takes all complaints of unlawful harassment seriously and **will not penalize you or retaliate against you in any way for reporting harassment in good faith.**

All complaints of unlawful harassment which are reported to management will be investigated as promptly as possible by an impartial and qualified person, and, upon conclusion of such investigation, appropriate corrective action will be taken where warranted. Imaginable Futures prohibits employees of Imaginable Futures from refusing to cooperate with internal investigations and the internal complaint procedure. All complaints of unlawful harassment which are reported to management will be treated with as much confidentiality as possible, consistent with the need to conduct an adequate investigation.

Violation of this policy will subject an employee to disciplinary action, up to and including immediate termination. Moreover, any employee or manager who condones or ignores potential violations of this policy will be subject to appropriate disciplinary action, up to and including termination.

This policy supersedes the policy set forth in the US Employee Handbook dated February 2020.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_