

# EQUAL EMPLOYMENT OPPORTUNITY AND HARASSMENT POLICY

#### Nondiscrimination/Affirmative Action

South Carolina Federal Credit Union is an equal employment opportunity employer in compliance with all applicable federal, state, and local laws governing the workplace. It is the policy of South Carolina Federal Credit Union not to discriminate against any employee or applicant because of race; sex; sexual orientation; transgender status; gender identity; color; religion; national origin; age; family medical history or genetic information; disability; veteran status; military service; marital and/or parental status; pregnancy; childbirth or related medical conditions, including, but not limited to, lactation; or other non-merit based factors or other protected characteristic under applicable law.

This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation and selection for training, including apprenticeship, at all levels of employment, employee benefits, application of policies, the use of facilities and participation in all company-sponsored employee activities. Provisions in applicable laws providing for bona fide occupational qualifications, business necessity or age limitations will be adhered to by the company where appropriate.

It is also the policy of South Carolina Federal Credit Union to take affirmative action as called for by applicable laws and Executive Orders to ensure that minority group individuals, females, disabled veterans, recently separated veterans, other protected veterans, Armed Forces service medal veterans, and qualified disabled persons are introduced into our workforce and considered for promotional opportunities.

This also includes fulfilling its obligations under the Americans with Disabilities Act, Pregnancy Accommodations Act and all other applicable federal, state, and local laws governing the workplace. Accordingly, it is incumbent upon any applicant or team member with a disability, known physical or mental limitations, and in cases of pregnancy, child birth or related medical conditions, to inform South Carolina Federal of his or her need for reasonable accommodation, so that South Carolina Federal may engage in the interactive process with the individual to address his or her needs. South Carolina Federal will work with the applicant or team member to determine whether and how the disability can be reasonably accommodated. Pursuant to the South Carolina Pregnancy Accommodations Act, applicants and employees have the right to be free from discrimination for medical needs arising from pregnancy, childbirth, or related medical conditions. All terms and conditions of employment with South Carolina Federal Credit Union are, and will continue to be, established based on the individual's qualifications and ability to perform the job.

## Implementation

The Chief Human Resources Officer is designated as the Equal Employment Opportunity and Affirmative Action Officer of the credit union and is responsible for communicating, implementing and monitoring this policy throughout South Carolina Federal.

All employees are responsible for ensuring that South Carolina Federal's equal employment opportunity policy is implemented in all employment-related decisions. Violation of this policy by an employee may result in disciplinary action, up to and including termination of employment. Employees may raise inquiries or complaints concerning equal employment opportunities to their managers, the Chief Human Resources Officer, the President/CEO, or by using the Dispute Resolution process.

## Harassment/Anti-Retaliation

Employees of South Carolina Federal Credit Union shall not be subjected to harassment on the basis of race; color; religion; sex; sexual orientation; gender identity; transgender status; national origin; age; marital status; genetic information; disability; pregnancy; childbirth or related medical conditions, including, but not limited to lactation; protected veteran status; or any other protected characteristic under applicable law. Harassing conduct may include, but is not limited to, offensive jokes, slurs, epithets or name-calling, physical assaults or threats, intimidation, ridicule or mockery, insults, offensive objects or pictures, obscene gestures, and interference with work performance. Harassment may also include sexual harassment, such as unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature.

Harassment of any form will be considered a violation of South Carolina Federal's anti-harassment policy and may result in corrective action up to and including termination of employment. Any employee who experiences or witnesses harassing conduct must promptly report the incident to his or her manager, the Chief Human Resources Officer, the President/CEO, or by using the Dispute Resolution process. All complaints of harassment shall be investigated promptly and in as confidential a manner as possible. Following investigation of the complaint, the appropriate supervisor shall meet with the complaining party and explain the outcome of the investigation, including whether there will be any corrective action taken and why such action is or is not warranted.

Additionally, retaliation, including intimidation, threats, or coercion, because an employee has (1) filed a complaint; (2) assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of any federal, state or local law requiring equal employment opportunity; (3) opposed any act or practice made unlawful by any federal, state or local law requiring equal opportunity; or (4) exercised any other legal right protected by federal, state or local law requiring equal opportunity, is prohibited.

Any acts of retaliation will be considered a violation of South Carolina Federal's anti-retaliation policy, and will result in corrective action up to and including termination of employment. Employees may raise concerns about possible retaliation in violation of this policy to their managers, the Chief Human Resources Officer, the President/CEO, or by using the Dispute Resolution process.

**Responding to EEO Inquiries/Other Legal Action and Investigations** Any employee who receives documents or outside inquiries regarding affirmative action equal employment opportunity, civil or criminal actions, and other inquiries or investigations regarding South Carolina Federal is not authorized to act as an agent for the Credit Union. No documents are to be submitted to a government agency or court without review by Human Resources and the President/CEO. Charges from state human rights agencies or the EEOC should be reported immediately to Human Resources. Inquiries or documents from, and investigations or inspections of South Carolina Federal's facilities or records by the OFCCP, the Department of Labor, state wage and hour divisions, or federal, state or local occupational safety and health agencies or environmental protection agencies should be referred immediately to Human Resources. Affirmative Action certificates from vendors and affirmative action commitments associated with contracts should be referred to Human Resources.

Documents regarding all other civil or criminal actions or contacts by an attorney representing an employee or former employee should be referred immediately to Human Resources.

## Self-Identification for Disability and Veteran Status

The OFCCP mandates that employers provide employees the opportunity to self-identify their disability or veteran status. Employees will have the opportunity to self-identify in one or both classes during the application stage and at the time of hire. Employees may also self-identify after hire via the Human Resources Information System (HRIS).