

GFI Anti-Harassment and Discrimination Policy

Promoting a Just and Safe Workplace in a Just and Safe Society

Sexual harassment and discrimination issues in the workplace and within our society as a whole are major issues. GFI is committed to core values that include respect and dignity for all people in all interactions. GFI promotes a workplace and society where discrimination and harassment of any kind is not tolerated. All GFI employees must, through their words and actions, always embody the highest standards of conduct and integrity.

As part of our commitment to a harassment-free society, we consider not just internal GFI operations and the training we provide to our employees, but also how we work with outside parties, including others within the animal protection and larger community. This is part of an overall commitment to equality, fair treatment, and compassion—and we promote those values within the nonprofit community and beyond.

A key part of GFI's commitment to equity and compassion is open communication, even on topics that can be particularly challenging. This is a central tenet of our anti-harassment and discrimination policy. We are open to hearing concerns, we will identify issues that must be addressed, and we will resolve them in an urgent and thorough manner reflecting the importance of fairness and equality to GFI as an organization.

Commitment to a Safe and Fair Workplace

Harassment and Discriminatory Conduct

GFI has a zero-tolerance policy regarding discrimination or sexual harassment. Legal prohibitions against discrimination and unequal treatment of protected classes will be strictly enforced, but those are minimum requirements—GFI prohibits workplace harassment and bullying of any kind. This policy extends not only to GFI employees as they interact with each other but also to employees acting on behalf of GFI and to third-parties, outside organizations, and individuals that interact with GFI employees.

Harassment is unwelcome conduct against a person that makes an individual feel threatened, publicly humiliated, or intimidated. It may include jokes, negative stereotyping, slurs, and intimidating or threatening acts. Harassment can occur in many ways, including denigrating or disrespectful written or graphic materials that circulate among co-workers or third parties affiliated with GFI via email, phone (including voice messages), text messages, blogs, or other means.

Such prohibited harassment includes discriminatory verbal, written, or physical conduct that denigrates or shows hostility, aversion, or favoritism toward a person because of race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, pregnancy, genetic information, marital status, amnesty, or status as a covered veteran and (1) has the purpose or effect of creating an intimidating, hostile, or offensive work environment, (2) has the purpose or effect of unreasonably interfering with a person's work performance, or (3) otherwise adversely affects a person's employment opportunities.

Sexual Harassment

Sexual harassment constitutes discrimination and is illegal under federal, state, and local laws. At a minimum, GFI views sexual harassment as the Equal Employment Opportunity Commission Guidelines

define it: unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment includes a range of behaviors and may involve persons of the same or different gender or sexual orientation. These behaviors include sexual jokes and innuendos; repeated and unwanted social invitations for dates; verbal abuse; suggestive comments about a person's body, sexual prowess, or sexual deficiencies; insulting or obscene comments or gestures; sharing of sexually suggestive objects or pictures; and other physical, verbal, or visual conduct of a sexual nature. GFI considers sexual or romantic advances or innuendos by persons in a supervisory or authoritative role toward subordinates within the same department or chain of command, or by persons having authority over staffing or salary decisions, to be harassment for which disciplinary action will be taken.

Applicability

This policy applies to all GFI employees, members of the GFI Board and Advisory Board, volunteers, independent contractors, service providers, donors, and members of the public involved in GFI activities. As a remote organization, three key areas of conduct are particularly important: electronic and phone communications, business travel, and staff retreats.

GFI shall ensure that its zero-tolerance policy is reflected throughout the organization, including in policies such as travel and at GFI staff retreats. Specifically, no employee will be required to share a bedroom with a person of a different sex or gender, or any other person that would result in their feeling vulnerable or unsafe.

This policy will be included in GFI's Employee Handbook, and all employees and interns will be required to sign the policy to indicate that they have read and understand it. It is the responsibility of each supervisor to ensure all of his or her reporting employees are aware of this policy. Nothing in any nondisclosure agreement signed by GFI employees shall be viewed as prohibiting reporting of conduct that violates this policy, whether internally to GFI or to an outside law enforcement organization. Because GFI has a zero-tolerance policy towards general harassment, bullying, sexual harassment, and discriminatory conduct, violations of this policy can be grounds for disciplinary action up to and including termination of employment.

Complaint and Investigation Process

People who believe they or others have been the victims of actions prohibited by this policy or who have witnessed such conduct must report it. GFI is open to and encourages prompt and full reporting of all perceived incidents of discrimination or harassment to any manager, the Director of Operations, GFI's General Counsel, or the Executive Director. Issues and incidents may also be reported anonymously. This includes not only communications from victims of improper or questionable conduct but also bystanders who witness harassment of another person.

GFI is committed to open communication, transparency and a workplace where all can speak their truth without fear of reprisal. As a result, GFI encourages people who believe they or others are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and tell them to stop (including refraining from similar actions in the future). Regardless of whether these actions

are taken, employees always are equally free to pursue the matter through established complaint procedures.

The most effective way to ensure that the GFI workplace remains a zero-tolerance environment for inappropriate behavior is to promptly address and report complaints or concerns. However, no fixed reporting period exists for perceived harassment, and all claims of harassment, discrimination, or retaliation will be promptly and thoroughly investigated.

In any such investigation, interviews with the parties involved may be conducted, as well as interviews with persons who may have observed the alleged conduct or may have other relevant knowledge. Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation, appropriate corrective action, and protection of the safety of the individuals involved.

In order to ensure that all such claims are appropriately investigated and addressed, any manager who receives a complaint of harassment or discrimination involving a GFI employee, contractor, or volunteer is required to report that complaint to GFI's General Counsel, Director of Operations, or Executive Director within two business days. Failure to do so will result in disciplinary action up to and including termination.

No Retaliation

In all cases, GFI prohibits any form of retaliation against anyone who reports a good faith concern about a violation of this policy or who participates in a related investigation. Such retaliatory actions are also a serious violation and are subject to disciplinary action up to and including termination. Acts of retaliation should immediately be reported to any manager, the Director of Operations, the General Counsel, or the Executive Director and will be promptly investigated and addressed. However, willfully false or malicious complaints of violation of this policy constitutes harassment and shall also be subject to disciplinary action.

Commitment to Training and Review

All employees are required to participate in bi-annual anti-harassment and anti-discrimination training, which will be provided by GFI. GFI's Director of Operations will coordinate with the General Counsel to ensure outreach to all employees at least annually to discuss whether the employee has witnessed or experienced discrimination or harassment. Additionally, GFI management shall monitor all identified incidents in an anonymized and aggregated manner, including related disciplinary actions, to help improve and monitor the efficacy of this policy and ensure that the policy continues to be effective.

GFI will continually renew its commitment to the safe and just workplace promoted by this policy. This includes reviewing and improving the policy's effectiveness as GFI grows, to ensure that it continues to promote and effectively protect GFI's core values and its commitment to fairness and integrity in GFI's workplace and all GFI operations.