

Equal Employment Opportunity and Anti-Discrimination Policy

I. OVERVIEW & SCOPE

Housatonic River Initiative of 165 Bradley Street, Lee, Massachusetts 01238, has established an Anti-Discrimination and Equal Employment Opportunity Policy ("Policy"). This Policy applies to all aspects of the relationship between Housatonic River Initiative and its employees, including, but not limited to, employment, recruitment, advertisements for employment, hiring and firing, compensation, assignment, classification of employees, termination, upgrading, promotions, transfer, training, working conditions, wages and salary administration, and employee benefits and application of policies. These policies apply to independent contractors, temporary employees, all personnel working on the premises, and any other persons or firms doing business for or with Housatonic River Initiative. Disciplinary action will be taken against any employee or agent in breach of this Policy.

II. POLICIES

1. DISCRIMINATION. Housatonic River Initiative is an equal opportunity employer committed to complying with all applicable anti-discrimination laws. Discrimination occurs whenever similarly situated individuals of a different group are accorded different and unequal treatment in the context of a similar situation. Housatonic River Initiative shall not tolerate, under any circumstances, without exception, the exclusion of individuals from an opportunity or participation in any activity because of race, color, gender, gender identity, sexual orientation, religion, national origin, familial status, age, disability, United States military veteran status, sexual orientation, gender identity or gender expression, and any other status protected by the law. This list is not exhaustive. Our policy of non-discrimination in employment applies, without limitation, to recruitment, hiring, compensation, promotions, transfers, discipline, demotions, terminations, layoffs, access to benefits and training and all other aspects of employment, as well as to selection of volunteers and vendors and provision of services. In addition, our policy of non-discrimination is intended to extend to visitors to our facilities and all of our stakeholders.

2. STATEMENT ON AFFIRMATIVE ACTION. An affirmative action program has been developed where Housatonic River Initiative seeks to increase the representation and participation of minorities.

3. REPORTING DISCRIMINATION & HARASSMENT. If an employee feels that he or she has been harassed as described in this Policy, they should immediately report the matter to management or through any verbal or written means. If that contact is not available, or if the employee is not comfortable informing this contact, the employee should immediately inform any other manager or supervisor. Once the matter has been reported it will be promptly investigated. The investigation will be conducted in a confidential manner to the extent consistent with the need to investigate and evaluate the complaint. The procedure for reporting incidents of discriminatory or harassing behavior is not intended to prevent the right of any employee to seek a remedy under available state or federal law by immediately reporting the matter to the appropriate state or federal agency.

4. NO RETALIATION. No retaliatory action will be taken against any person who in good faith reports conduct that she or he believes may violate this Policy. No retaliatory action will be taken against any individual for assisting or participating in an investigation, proceeding or hearing related to a harassment complaint.

5. DISCIPLINARY MEASURES FOR HARASSMENT. Where an employee is determined to have violated this Policy, the Company will take disciplinary action, up to and including termination. Where a

non-employee is determined to have violated this Policy, the Company will take action reasonably calculated to end the harassment.

6. REMEDIES. Remedies for any instances of verified employment discrimination, whether caused intentionally or by actions that have a discriminatory effect, may include back pay, hiring, promotion, reinstatement, front pay, reasonable accommodation, or other actions deemed appropriate by Housatonic River Initiative. Remedies can also include payment of attorney's fees, expert witness fees, court costs and other applicable legal fees.

7. POLICY IMPLEMENTATION. Implementation of this Policy will be effective as of May 09, 2024.