

# Venture FOR AMERICA

## Open and Inclusive Workplace Policy

### (Fellows & Company Partners)

#### Objective

Venture For America (VFA) requires companies that hire VFA Fellows to foster a corporate culture that is open and inclusive. All companies that interview VFA Fellows agree to this Policy as part of the Company Partner hiring agreement, with the understanding that VFA may terminate its relationship with any company and that VFA, in its sole and absolute discretion, determines if a company may have violated this Policy. This document describes conduct that VFA considers to be in violation of this Policy and outlines a process for reporting, investigation, and response when VFA becomes aware of a possible violation.

#### Scope of Policy

This Policy applies to any company that, through a contractual relationship with VFA and/or through the VFA Match Process, interviews for employment and/or employs a VFA Fellow during their two-year Fellowship (Company Partners), beginning with the company's first interactions with a Fellow. This includes, but is not limited to, all interactions facilitated by the VFA Match platform as well as any interactions that take place off the Match platform during the interview, hiring and training process and during the term of, and in connection with the termination of, a Fellow's employment with a company. For the avoidance of doubt, VFA reserves the right to decline to work with a company as a future VFA Company Partner if VFA alums employed at such company report one or more incidents of violations of this Policy or if employees of VFA (Team Members) directly observe one or more incidents in violation of this Policy. This Policy applies to working conditions, compensation, benefits, and social or recreational programs, whether on company premises or off site.

No VFA Fellow is, solely by virtue of their participation in the VFA Fellowship Program or by the existence of this policy, an employee of Venture For America.

#### Discriminatory Practices

For the purposes of this Policy, discriminatory practices may include, but are not limited to, the following when they are directed at or occur in the presence of VFA Fellows or Team Members:

- Use of racial, ethnic, or religious slurs
- Offensive or derogatory remarks about a person's race or color, or the display of racially offensive symbols

- Sexual harassment and sexual assault, including unwelcome verbal or physical conduct of a sexual nature
- Offensive or derogatory remarks about a person's gender, gender presentation, or LGBTQ+ identity
- Unfavorable treatment of an applicant or employee, such as refusal to hire or promote, or otherwise applying policies in an unequal and harmful way to an applicant or employee, because of such person's race, sex, sexual orientation, or other legally protected class status.
- Conduct designed to threaten, intimidate, or coerce an applicant or employee, including as retaliation for reporting conduct in violation of this Policy or to discourage reporting of conduct in violation of this Policy

## Reporting of Discriminatory Practices

Fellows should use the [Inappropriate Conduct Incident Reporting \(ICIR\)](#) form to report discriminatory practices by a Company Partner, which, for the avoidance of doubt, includes any managers, directors, employees, or other personnel of such Company Partner. If the Fellow makes their first report to a VFA Team Member, that Team Member should direct them to use this form.

VFA encourages Fellows to bring their concerns to the attention of a VFA Team Member before a situation escalates. VFA will not discipline or take any action against any Fellow for raising any concerns under this Policy.

## Investigations and Enforcement

Upon receipt of a report via [ICIR form](#), VFA will convene a review committee (Committee) consisting of the Chief Executive Officer, Chief Operating Officer, Chief Program Officer, and the Senior Director of Company Partnerships. The Community Director responsible for managing the program in the city in which the company operates will provide information to the committee but will not be a decision-making member of the committee.

The Committee will promptly and thoroughly investigate all reports of discriminatory practices by company partners. The steps of an appropriate investigation will vary, in VFA's reasonable discretion, depending upon the nature of the allegations. Investigation by the Committee may, but is not required to, include private interviews with the alleged victim(s) and any direct witnesses to the relevant event, and review of emails sent to or from VFA company email accounts (i.e., email addresses ending in @ventureforamerica.org), records of incoming and outgoing calls from VFA company telephone lines or subsidized telephone lines, communications sent through the VFA Match platform, as well as information provided to VFA in surveys.

A written summary report setting forth the details shared with the relevant member of the Committee may be prepared.

In case of an immediate threat of violence or emergency in which an injury has occurred, the notified member of the Committee may contact local police and emergency medical personnel.

VFA may, at any time, share details of any reported incident, including the identity of the various parties, with its legal advisers or Board of Directors.

## **Termination of Relationship**

If VFA determines through an investigation that conduct in violation of this Policy has occurred and that the company has not taken steps, to the satisfaction of VFA, in its sole discretion, to address the relevant conduct, VFA may choose to end its relationship with that company partner. In such an event, the following will occur:

1. VFA will send an email to the leadership of the Company Partner informing them of the end of the relationship and the reason for the decision.
2. The company will not be allowed to participate in VFA Match or hire any additional VFA Fellows as part of their fellowship.
3. Any current Fellow employed there will be informed that the company is no longer an approved VFA Company Partner, and that if they wish to find a new job, VFA will assist them in doing so using its standard process for Fellows in job transitions due to layoff or unsafe work environment. If any Fellow wishes to remain employed at the discontinued Company Partner, they may do so without any impact on their VFA Fellowship status.