

Greening Forward Anti-Discrimination and Non-Harassment Policy

OFF-PREMISES WORK ENVIRONMENT

Much of Greening Forward's work occurs away from our main office. Staff members and volunteers meet with young people, educators, and partners all across the country to promote Greening Forward's mission.

Greening Forward staff must represent Greening Forward whenever and wherever they are present for Greening Forward purposes. Their conduct in those situations should follow Greening Forward's commitment to inclusivity and diversity.

If in staff in off-premises work you are subjected to inappropriate or unwelcome or threatening attention, you should immediately report the incident to your supervisor. Though Greening Forward has less control over environments outside of its own premises, Greening Forward will promptly review any reported situation and take reasonable action to address the situation.

ANTI-DISCRIMINATION POLICY

Greening Forward is committed to the principles of equal opportunity, nondiscrimination, and affirmative action. This Anti-Discrimination Policy prohibits acts of discrimination and harassment on the basis of age, color, gender, gender identity, disability status, height, marital status, national origin, political persuasion, race, religion, sexual orientation, veteran status, or weight. Greening Forward is also guided by the federal and state civil rights laws below that prohibit discrimination.

Race, Color, Religion, Sex, National Origin

Title VII of the Civil Rights Act of 1964, as amended, protects applicants and employees from discrimination in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment, on the basis of race, color, religion, sex (including pregnancy), or national origin. Religious discrimination includes failing to reasonably accommodate an employee's religious practices where the accommodation does not impose undue hardship. Amended Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in any program or activity receiving federal financial assistance. Executive Order 11246 prohibits job discrimination on the basis of race, gender, or national origin, and requires affirmative action to ensure equality of opportunity in all aspects of employment.

Americans with Disabilities Act

Title I and Title II of the Americans with Disabilities Act of 1990, as amended, protect qualified individuals from discrimination on the basis of disability in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. Disability discrimination includes not making reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, barring undue hardship. Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability in admission, employment, treatment, or access in programs or activities receiving federal financial assistance.

Age

The Age Discrimination in Employment Act of 1967, as amended, protects applicants and employees 40 years of age or older from discrimination based on age in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. The Act prohibits discrimination based on age in programs or activities receiving federal financial assistance.

Sex

In addition to sex discrimination prohibited by Title VII of the Civil Rights Act, the Equal Pay Act of 1963, as amended, prohibits sex discrimination in the payment of wages to women and men performing substantially equal work, in jobs that require equal skill, effort, and responsibility, under similar working conditions, in the same establishment. Title IX of the Education Amendments of 1972 prohibits discrimination based on gender in education programs or activities. Protection is extended to include employment and admissions at institutions that receive federal financial assistance.

Genetic Information

Title II of the Genetic Information Nondiscrimination Act ("GINA") of 2008 protects applicants and employees from discrimination based on genetic information in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. GINA also restricts employers' acquisition of genetic information and strictly limits disclosure of genetic information. Genetic information includes information about genetic tests of applicants, employees, or their family members; the manifestation of diseases or disorders in family members (family medical history); and requests for or receipt of genetic services by applicants, employees, or their family members.

Military Service Members and Veterans

The Uniformed Services Employment and Re-employment Rights Act of 1994, as amended, prohibits discrimination against persons because of their service in the Armed Forces Reserve, the National Guard, or other uniformed services. The act protects the rights of veterans, reservists, National Guard members, and certain other members of the uniformed services to reclaim their civilian employment after being absent due to military service or training. The Vietnam Era Veterans Readjustment Act of 1972 prohibits certain government contractors from discriminating against qualified disabled veterans or Vietnam era veterans. The act also

requires contractors to engage in affirmative action to employ and advance veterans in employment.

IMMIGRATION REFORM AND CONTROL ACT

In compliance with the federal Immigration Reform and Control Act of 1986 (IRCA), as amended, Greening Forward is committed to employing only individuals who are authorized to work in the United States.

Each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form 1-9 and present documentation establishing identity and employment eligibility.

If an employee is authorized to work in this country for a limited time period, the individual will be required to submit proof of renewed employment eligibility prior to expiration of that period to remain employed.

EQUAL EMPLOYMENT OPPORTUNITY

Greening Forward is committed to equal employment opportunity. We will not discriminate against employees or applicants for employment on any legally-recognized basis including, but not limited to: race; color; creed; religion; national origin and ancestry; sex; pregnancy, childbirth and related disabilities; marital or familial status; disability; genetic information ; sexual orientation; age; height; weight; veteran status; and physical or mental disability.

BACKGROUND CHECKS

To ensure that individuals who join Greening Forward are well qualified and have a strong potential to be productive and successful, it is our policy to check the employment references of all applicants. In addition, criminal background checks will be required in accordance with applicable state law. Employment offers are subject to the outcome of

background checks. Unfavorable information obtained through reference checks or through criminal background checks will result in the offer of employment being withdrawn.

The VP of Operations will respond to all reference check inquiries from other employers. Responses to such inquiries will confirm only dates of employment, positions held, and titles. For more extensive requests, employment data will not be released without a written authorization and release signed by the individual who is the subject of the inquiry undermining public confidence in the integrity of Greening Forward programs.

Any violation of ethical standards will be evaluated by the Board of Directors of Greening Forward and appropriate corrective action, including dismissal or legal proceedings, may be taken.

WHISTLE BLOWER POLICY

Greening Forward is committed to high standards of ethical, moral, and legal business conduct. In line with this commitment, and Greening Forward's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and receive reassurance that they will be protected from reprisals or victimization for whistle blowing.

This Whistle Blowing Policy is intended to cover protections for you if you raise concerns regarding Greening Forward, such as concerns regarding:

- incorrect financial reporting;
- unlawful activity;
- activities that are not in line with Greening Forward policy, including the Code of Business Conduct; or
- activities that otherwise amount to serious improper conduct.

Safeguards

Harassment or Victimization - Harassment or victimization for reporting concerns under this policy will not be tolerated.

Confidentiality - Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

Anonymous Allegations - This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from identifiable sources.

Bad Faith Allegations – Allegations made in bad faith may result in disciplinary action.

Procedures for implementation of the Whistle Blower Policy are the same as those for filing a Grievance listed elsewhere in this manual.

GRIEVANCE PROCEDURE

Should any employee or other interested party have a grievance to be filed, he/she is to adhere to the following steps.

1. Prepare a written document that contains the nature of the grievance, the specific policy that is perceived to have been violated, and the parties involved.
2. Submit this document to the immediate supervisor unless the supervisor is a party in the complaint. In that case, proceed to step 3.
3. If the complainant is not satisfied with the response received from the immediate supervisor, or if the immediate supervisor is a party in the complaint, submit the document to the Greening Forward

President/CEO who will discuss the matter with all involved in the attempt to reach a settlement.

4. If the result of the intervention by the President/CEO is unsatisfactory to the complainant, submit the document to the Chairperson of the Board of Directors who will assemble the Grievance Committee of the Board of Directors to deal with the situation. The Grievance Committee of the Board of Directors will make a final decision.

THIS ANTI-DISCRIMINATION AND ANTI-HARASSMENT POLICY HAS BEEN APPROVED BY THE GREENING FORWARD BOARD OF DIRECTORS ON 20TH DAY OF AUGUST 2013.