



OPERATING POLICIES

O.P. NUMBER	TITLE	ISSUE DATE	REVISION DATE
H-07	Equal Employment Opportunity <u>Policy</u>	4/29/98	<u>11/5/124/</u> <u>/22</u>

PURPOSE

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The Metropolitan Water District of Southern California ~~maintains:~~

- ~~Nondiscriminatory employment practices;~~
- ~~An ("Metropolitan") is committed to maintaining a respectful and professional workplace that promotes equal employment opportunity (EEO) program opportunities and prohibits discriminatory practices.~~

The Metropolitan Water District of Southern California:

- ~~Will not tolerate discrimination against an employee or applicant based on a legally protected characteristic, or harassment of an employee, applicant, or contractor based on a legally protected characteristic;~~

~~Will~~ Discrimination, harassment, and retaliation is illegal under federal, state, and local laws. As such, Metropolitan maintains this zero-tolerance policy, which strictly prohibits discrimination, harassment, and retaliation in any form. Abusive conduct is not yet prohibited by law, but it may lead to discriminatory conduct and is to be avoided.

The objective of this policy is to define discrimination, harassment, and retaliation, as well as abusive conduct, and to reaffirm Metropolitan's commitment to take action any actions necessary to prevent and eliminate such conduct, as required by law.

Metropolitan has a zero-tolerance policy for any conduct that violates this policy. Conduct need not rise to the level of a violation of law to violate this policy. Metropolitan will implement appropriate corrective action(s), up to and including formal discipline, in response to any violations of this policy, even if the violation does not rise to the level of unlawful conduct.

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AUTHORITY

Metropolitan maintains this Equal Employment Opportunity ("EEO") policy consistent with federal, state, and local law. The General Manager delegates authority for administering and enforcing Metropolitan's EEO program and this policy to the Chief EEO Officer.

SUPERSESSON

This Operating Policy supersedes Operating Policy H-07, dated April 29, 1998, and revised on September 25, 2001, June 2, 2005- and April 29, 2010-, and November 5, 2012. This policy will be reviewed annually.



SUMMARY AUTHORITY

The Metropolitan Water District maintains an **True** equal employment opportunity **cannot be accomplished if discrimination, harassment, or retaliation is tolerated.** Accordingly, all such conduct is expressly prohibited by this policy as authorized by federal, state,

Metropolitan is committed to maintaining a respectful, professional, and local law. The General Manager delegates authority for administering inclusive work environment that is free from discrimination and enforcing harassment based on a **“Protected Characteristic”** (as defined below), and an environment free from retaliation for participating in any **“Protected Activity”** (as defined below) covered by this policy. In accordance with this commitment, it is Metropolitan’s **Equal Employment Opportunity Program** to the Chief Administrative Officer and the Human Resources Group Manager policy to provide equal employment opportunities to all employees and applicants for employment.

In furtherance of these objectives, Metropolitan is committed to ensuring that no employee, applicant, intern, volunteer, or contractor is subjected to discrimination, harassment, or retaliation. Unlawful discrimination, harassment, or retaliation in any form will not be tolerated.

SCOPE OF PROTECTION

This policy applies to applicants and employees (including interns, volunteers, and contractors) of Metropolitan (hereinafter referred to as **“Covered Individuals”**). In addition, this policy extends to conduct with a connection to an employee’s work, even when the conduct takes place away from Metropolitan’s premises, such as a business trip or work-related social function.

DEFINITIONS

The definitions for equal employment opportunity **Protected Characteristic** – Discrimination and harassment against a Covered Individual (as defined above) based on any of the following actual or perceived *Protected Characteristics* is strictly prohibited by this policy:

- age (40 and above);
- race or ethnicity;
- color;
- national origin or ancestry;
- citizenship status;
- religion or religious creed (including religious dress and grooming practices);



- mental or physical disability;¹
- genetic information or genetic characteristics;
- marital status;
- medical condition (including AIDS/HIV status and cancer or having a history of cancer);
- sex (including pregnancy, childbirth, breastfeeding, and related ~~terms~~ medical conditions);
- gender;
- gender identity or gender expression² (which includes those who identify as transgender, those who are contained transitioning or have transitioned, and sexual stereotypes);
- sexual orientation;
- military and veteran status;
- requesting or taking a protected leave of absence; or
- any other protected status in Administrative Code Sections 6300 and 6305, as revised, and may be obtained accordance with all applicable federal, state, and local laws.

Protected Activity – This policy strictly prohibits retaliation (or taking adverse employment actions) against Covered Individuals who engage in *Protected Activity*, including, but not limited to:

- reporting suspected violations of this policy;
- cooperating in investigations or proceedings arising out of a violation of this policy;
- filing a complaint with an external regulatory agency;
- resisting harassing behavior or intervening to protect others from the Equal harassing behavior;
- refusing to obey an order reasonably believed to be discriminatory or illegal;
- requesting accommodation for a disability or for religious beliefs; or
- requesting or taking a protected leave of absence.

Adverse Employment Opportunity Manager Action – An *adverse employment action* is conduct or an action that materially affects

¹ Metropolitan recognizes and supports the obligation to reasonably accommodate employees with disabilities or religious beliefs or practices in order to allow those employees to perform the essential functions of their jobs. If an employee believes they need a reasonable accommodation based on disability or a religious belief or practice, the employee should discuss the matter with their supervisor or the Human Resources Department.

² See definitions section below on “gender identity” and “gender expression.”



the terms and conditions of employment or would deter a reasonable employee (or Covered Individual) from engaging in "Protected Activity" (as defined above). Even actions that do not result in a direct loss of compensation may be regarded as an adverse employment action when considered in the totality of the circumstances.

Gender Identity – The term *gender identity* refers to a person's deeply felt internal understanding of their gender, or the perception of a person's gender identity, regardless of actual sex. A person may identify as male, female, a combination of male and female, neither male nor female, a gender different from the person's sex assigned at birth, or transgender.

Gender Expression – The term *gender expression* refers to a person's gender-related appearance or behavior, or the perception of such appearance or behavior, which may or may not conform to socially defined characteristics typically associated with being either masculine or feminine.

POLICIES PROHIBIT ED CONDUCT

- ~~1. Metropolitan requires a work environment free of discrimination or harassment on the basis of race, sex (gender or pregnancy), creed, national origin, color, disability (physical or mental), protected veteran status, religion, age (40 and above), medical condition, genetic information, marital status, ancestry, sexual orientation, gender identity or expression, or other characteristic protected by law.~~
- ~~2. Metropolitan does not and will not tolerate discrimination against any applicant or employee in opportunities, terms, conditions, or privileges of employment on the basis of any characteristic protected by law, which are listed above. Metropolitan also does not and will not tolerate harassment of any applicant, employee, or contractor on the basis of any characteristic protected by law. Such discrimination and harassment is~~

All of Metropolitan's employees, applicants, interns, volunteers, and contractors ("**Covered Individuals**") must be treated with respect and dignity. As such, Metropolitan strictly prohibits discrimination, harassment, or retaliation based on any Protected Characteristic(s). Metropolitan will take affirmative steps to correct and eliminate any conduct that is in violation of this policy.

This policy prohibits discriminatory, harassing, and retaliatory conduct, regardless of whether the conduct rises to the level of a legal violation.

A. Discrimination – As used in this policy, *discrimination* is defined as the unequal treatment of Covered Individuals in any aspect of employment, including discrimination based on the Covered Individual's actual or perceived Protected Characteristic(s). Discrimination also includes unequal treatment because of a Covered Individual's association with an individual with a Protected Characteristic.



Examples of discriminatory behavior includes, but is not limited to:

- 1) Basing an employment decision (e.g., decision to hire, promote, transfer, discipline, etc.) on one's Protected Characteristic(s).
- 2) Taking adverse employment action (e.g., discipline, demotion, termination, etc.) based on one's Protected Characteristic(s).
- 3) Treating an applicant or employee differently with regard to any aspect of employment because of their actual or perceived Protected Characteristic(s).

B. Harassment – *Harassment* is defined as disrespectful or unprofessional conduct, including disrespectful or unprofessional conduct based on any of the Protected Characteristics listed above.

Harassment may take many forms, but most commonly includes the following:

- 1) **Verbal harassment** such as epithets, derogatory statements, slurs, jokes, unwelcome remarks about an individual's body, dress, clothing, color, physical appearance or talents, questions about a person's sexual practices, and/or patronizing terms or remarks;
- 2) **Physical harassment** such as assault, unwanted touching or physical contact, impeding or blocking normal movement, physical interference with normal work, and/or threatening, intimidating, or hostile acts that relate to a Protected Characteristic(s);
- 3) **Visual harassment** such as displaying offensive pictures, cartoons, drawings, posters, screensavers, virtual backgrounds, or electronic or media-based visuals (such as emails, text messages, memes, emojis, gifs and video games), or displaying offensive objects, gestures, letters or notes, or any other graphic material that denigrates or shows hostility or aversion towards an individual because of the individual's Protected Characteristic(s); and
- 4) **Use of social media** to conduct discriminatory harassment.

Harassment prohibited by this policy- also includes sexual harassment, which is discussed in further detail in Operating Policy No. H-13.

C. Retaliation – *Retaliation* occurs when a Covered Individual is subjected to an adverse employment action because they engaged in activity protected under this policy ("Protected Activity"), such as reporting suspected violations of this policy and/or cooperating in investigations or proceedings arising out of a violation of this policy.

- 1) As stated above, an adverse employment action is conduct that materially affects the terms and conditions of



employment, or any conduct that would deter a reasonable employee (or Covered Individual) from engaging in Protected Activity.

- 2) **Examples of retaliation** under this policy include, but are not limited to: demotion; suspension; reduction in pay; denial of a merit salary increase; failure to hire or consider for hire; refusing to promote or consider for promotion because of Protected Activity; harassing another employee for filing a complaint; denying employment opportunities because of Protected Activity; changing someone's work assignments for identifying harassment or other forms of discrimination in the workplace; treating people differently such as denying an accommodation; or not talking to an employee when otherwise required by job duties; singling a person out for harsher treatment because of Protected Activity; lowering a performance evaluation because of Protected Activity; withholding pay increases or assigning more onerous work, abolishing a position, taking a form of disciplinary action because of Protected Activity; spreading rumors about a complaint or a complainant because of Protected Activity, or otherwise excluding the employee from job-related activities because the employee engaged in Protected Activity.

D. Abusive Conduct – Abusive conduct means conduct by an employer, employee, intern, contractor, or volunteer in the workplace, with malice, that a reasonable person would find hostile, offensive, and unrelated to an employer's legitimate business interests. Abusive conduct may include repeated infliction of verbal abuse, such as the use of derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person's work performance. A single act shall not constitute abusive conduct, unless especially severe and egregious. Notably, abusive conduct does not include actions directed at a person because of their actual or perceived Protected Characteristic(s).

Examples of abusive conduct include, but are not limited to:

- Mocking, insulting, or ridiculing;
- Spreading rumors, hurtful gossip, or innuendo;
- Offensively discounting a person's ideas in front of others without a legitimate business reason;
- Repeated yelling, shouting, or using a threatening tone towards another;
- Using foul and profane language;
- Unwanted physical contact or physical gestures that intimidate or threaten;
- Repeatedly calling someone a humiliating "nickname";



- Glaring at a person to intimidate them; and
- Intentionally and repeatedly discrediting another's work without a legitimate business reason.

Any person who believes that they have been subjected to abusive conduct should promptly report the incident to a supervisor or any other member of Metropolitan's management team, or to the Human Resources Department. All allegations will be investigated promptly. Complaints will be kept as confidential as possible. If the allegation is sustained, prompt and appropriate remedial action shall be taken.

Abusive conduct is misconduct which may result in disciplinary action, up to and including termination.

RIGHTS OF COVERED INDIVIDUALS

- 1) The right to a discrimination-free, harassment-free, and retaliation-free work environment.
- 2) The right to file a complaint of discrimination, harassment, or retaliation. Employees are encouraged to report inappropriate conduct immediately and, whenever possible, to put the complaint or concern in writing.
 - a. Please see the **EEO Complaint and Investigation Procedures** for Metropolitan's full written investigatory procedures and processes, which can be obtained from Metropolitan's EEO Office.
- 3) The right to a full, impartial, and prompt investigation by a qualified Metropolitan representative or designee into allegations of conduct that would violate this policy.
- 4) The right to be free from retaliation or reprisal after filing a complaint or participating in the complaint or investigation process.
- 5) The right to file a complaint directly with the California Department of Fair Employment and Housing, the federal Equal Employment Opportunity Commission, or other appropriate state or federal agencies, or to file a civil action in the appropriate court.

RESPONSIBILITIES

Metropolitan takes all complaints seriously and will take affirmative steps to resolve any problems that may arise. It is the responsibility of each individual at Metropolitan, whether directly involved in the incident or not, to assure that discrimination, harassment, or retaliation does not occur in the workplace.

If a Covered Individual believes that prohibited harassment, discrimination, or retaliation is occurring, or observes any such prohibited conduct, that individual should promptly report the incident(s) to Metropolitan's EEO Office. **Supervisors or managers who learn of any potential violation of this policy are required to immediately report the matter to the EEO Officer and must follow that officer's instructions as to how best to proceed.**



No individual will be retaliated against or otherwise disciplined for reporting, in good faith, an incident of harassment, discrimination, or retaliation, or for participating in an investigation. The complainant and all participants in an investigation have the assurance of Metropolitan that no reprisals will be taken as the result of the complaint, unless the complaint was filed in bad faith or for an improper purpose.

ADDRESSING AND REPORTING VIOLATIONS OF THIS POLICY

Any Covered Individual who experiences or witnesses behavior that they believe violates this policy is encouraged to immediately tell the offending individual that the behavior is inappropriate, if they feel comfortable doing so, and to tell the offending individual to stop the behavior.

The Covered Individual should also immediately report the alleged violation to their supervisor, manager, or the EEO Office. ***If a supervisor or manager learns of a potential violation of this policy, they are required to immediately report the matter to the EEO Officer.*** There is no chain of command when contacting the EEO Officer; an individual does not need supervisor or manager approval to do this. If the alleged offender is the employee's supervisor or manager, the employee should report the conduct to any other supervisor, manager, or the EEO Officer. Covered Individuals are not required to report the matter directly to the offending individual or their immediate supervisor and may opt to report the matter directly to the EEO Office. A complaint may be brought forward verbally or in writing.

Please see the **EEO Complaint and Investigation Procedures** for Metropolitan's full written investigatory procedures and processes, which can be obtained from Metropolitan's EEO Office.

Upon receiving a complaint alleging violation(s) of this policy, Metropolitan will promptly look into the facts and circumstances of any alleged violation, as appropriate. Even in the absence of a formal complaint, Metropolitan may initiate an investigation where it has reason to believe that conduct that violates this policy may have occurred. Moreover, even where a complainant conveys a request to withdraw their initial formal complaint, Metropolitan may continue the investigation to ensure that the workplace is free from discrimination, harassment, and retaliation. Anonymous complaints will also be investigated. All investigations will be fair, impartial, timely, and promptly initiated and promptly completed by qualified personnel.

In addition, Covered Individuals may file formal complaints of discrimination, harassment, or retaliation with the agencies listed below. Individuals who wish to pursue filing with these agencies should contact them directly to obtain further information about their processes and time limits.

California Department of Fair Employment and Housing (DFEH)
2218 Kausen Drive, Suite 100



Elk Grove, CA 95758
800-884-1684 (voice), 800-700-2320 (TTY) or California's Relay
Service at 711
contact.center@dfeh.ca.gov
<https://www.dfeh.ca.gov>

Los Angeles Equal Employment Opportunity Commission (EEOC)

Roybal Federal Building
255 East Temple St., 4th Floor
Los Angeles, CA 90012
Phone: (213) 785-3090
Fax: (213) 894-1118
1-800-669-4000 or 510-735-8909 (Deaf/hard-of-hearing callers
only)
<http://www.eeoc.gov/employees>

CONFIDENTIALITY

To the extent possible, Metropolitan will endeavor to keep the reporting of the Covered Individual's concerns confidential; however, complete confidentiality cannot be guaranteed when it interferes with Metropolitan's ability to fulfill its obligations under this policy. All employees are required to cooperate fully with any investigation. This includes, but is not limited to, maintaining an appropriate level of discretion regarding the investigation and disclosing any and all information to the EEO Office that may be pertinent to the investigation. Upon completion of the investigation, if misconduct is substantiated, Metropolitan will take appropriate corrective and preventive action calculated to end the conduct, up to and including formal discipline where warranted.

TRAINING

All Metropolitan employees are required to participate in sexual harassment prevention training. The training will be aimed at increasing the understanding of, and preventing, workplace sexual harassment and other types of harassment, discrimination, and retaliation based on EEO Protected Characteristics, and abusive conduct.

Metropolitan employees are required to take this mandatory training in accordance with the following:

1. All **supervisory employees** are required to take *two (2) hours of training within six months of assumption of their supervisory role.*
2. All **non-supervisory employees** are required to take *one (1) hour of training within six months of hire.*
3. Temporary, seasonal, or any other employee expected to work less than 6 months must complete this training within 30 calendar days after hire or within 100 hours worked, whichever occurs first.

All employees must take this mandatory training at least once every



two years, thereafter.

Metropolitan will make this training available to employees during regular working hours at no cost to the employee. Metropolitan will maintain records of these mandatory trainings.

REFERENCES

- Administrative Code Sections 6219, 6300—6305, 7111
- Operating Policy H-03 and H-13 [may need to be updated]
- Applicable executive orders, federal, state, and local laws, statutes, and regulations
- Discrimination Complaint Procedures [may need to be updated]
- Applicable Metropolitan Board directives and policies
- Memoranda of Understanding

APPROVAL

Adel Hagekhalil, General Manager Date



OPERATING POLICIES

O.P. NUMBER	TITLE	ISSUE DATE	REVISION DATE
H-07	Equal Employment Opportunity	4/29/98	11/5/12

POLICIES (continued)

- ~~3. Discrimination of an applicant or employee, and harassment of an applicant, employee, or contractor, based on a legally protected characteristic is also prohibited by state and federal law. In addition, state and federal law prohibit retaliation against a person for filing a complaint, assisting or participating in an investigation or proceeding, or opposing discrimination or harassment based on a legally protected characteristic.~~
- ~~4. Engaging in discrimination or harassment in violation of this policy is conduct subject to disciplinary action, up to and including dismissal.~~
- ~~5. All complaints of discrimination or harassment based on a legally protected characteristic are taken seriously, investigated promptly as appropriate, and appropriate action is taken against individuals found to have engaged in such discrimination or harassment. Metropolitan has established and maintains an internal complaint procedure for processing alleged violations of the EEO Policy.~~
- ~~6. The prohibition against discrimination and harassment based on a legally protected characteristic applies to all transactions of Metropolitan's business, whether at a Metropolitan-operated facility or external site.~~
- ~~7. If an employee or applicant believes that he or she has been subjected to discrimination based on a legally protected characteristic by any Metropolitan employee or representative; or if an employee, applicant, or contractor believes that he or she has been subjected to harassment based on a legally protected characteristic by any Metropolitan employee, consultant or other contractor, vendor, client, or other business contact; the individual should immediately report the incident directly to: (1) the EEO Investigations Staff or the Employee Relations Section Manager, who are responsible for receiving and processing such reports for Metropolitan; (2) the Ethics Office, who is responsible for receiving and processing reports regarding alleged director misconduct; or, (3) to another manager or supervisor, including but not limited to, the HR Group Manager, another Group Manager, or the Ethics Officer.~~



OPERATING POLICIES

O.P. NUMBER	TITLE	ISSUE DATE	REVISION DATE
H-07	Equal Employment Opportunity	4/29/98	11/5/12

POLICIES (continued)

- ~~8. Metropolitan does not retaliate, nor tolerate retaliation, against employees, applicants, or contractors who, in good faith, make a complaint of discrimination or harassment based on a legally-protected characteristic, assist or participate in a related investigation or proceeding, or oppose discrimination or harassment based on a legally protected characteristic. Such retaliation is prohibited by this policy. Any act of such retaliation should be reported immediately to: (1) the EEO Investigations Staff or the Employee Relations Section Manager, who are responsible for receiving and processing such reports for Metropolitan; (2) the Ethics Office, who is responsible for receiving and processing reports regarding alleged director misconduct; or, (3) to another manager or supervisor, including but not limited to, the HR Group Manager, another Group Manager, or the Ethics Officer. Reports will be investigated as appropriate and, where appropriate, corrective action will be taken. Any person who engages in such retaliation is subject to disciplinary action, up to and including dismissal.~~
- ~~9. Complaints made frivolously, in bad faith or without factual basis may be actionable by the respondent. Such complaints may result in disciplinary action, up to and including dismissal.~~
- ~~10. Metropolitan employees will receive a copy of this policy during new employee orientation and review it as part of their mandatory unlawful workplace harassment training.~~
- ~~11. Metropolitan maintains an affirmative action plan and nondiscrimination program in accordance with applicable law.~~

RESPONSIBILITIES

- ~~It is the responsibility of every District manager and supervisor to:~~
- ~~• Provide employees under his or her direct supervision, applicants, and contractors with a discrimination and harassment-free work environment, which includes not engaging in, condoning or tolerating behavior that could reasonably be considered a violation of this policy and monitoring the work environment of employees for conduct that could violate this policy.~~
 - ~~• Enforce the District's EEO Policy and inform employees under his or her direct supervision of the District's EEO Policy, and their right to recourse for activities that may violate the policy.~~



OPERATING POLICIES

O.P. NUMBER	TITLE	ISSUE DATE	REVISION DATE
H-07	Equal Employment Opportunity	4/29/98	11/5/12

RESPONSIBILITIES (continued)

- Create an environment where employees, applicants, and contractors do not feel intimidated and/or prevented from reporting an incident in violation of this policy.
- Immediately report any conduct that may reasonably violate this policy, or any such allegation to the EEO Investigations Staff. (If appropriate, such conduct may also be reported outside of the Human Resources Group, to the Legal Department and/or Ethics Officer.)
- Cooperate in an investigation related to any complaint of a violation of this policy. Managers and supervisors are prohibited from discussing the complaint outside of the investigative process, unless this is done in connection with performing the manager's or supervisor's job duties, required or permitted by law, or authorized by the Legal Department or other appropriate authority. Failure to cooperate or deliberately providing false or misleading information during an investigation, or discussing the complaint outside the investigative process, may be grounds for disciplinary action, up to and including dismissal.
- Not engage in, condone or tolerate behavior that could reasonably constitute retaliation of an employee, applicant, or contractor for alleging or opposing discrimination or harassment based on a legally protected characteristic, or participating in a related investigation or proceeding.
- Successfully and timely complete unlawful workplace harassment prevention training as mandated and ensure that employees under his or her direct supervision timely and successfully complete such training.

It is the responsibility of **every District employee**, including supervisors and managers, to:

- Be familiar with and understand Metropolitan's EEO policy on maintaining a discrimination and harassment free work environment, including the procedures for reporting violations of that policy.
- Act in a manner that does not discriminate against or harass other employees, applicants, or contractors based on a legally protected characteristic, or engage in behavior that could reasonably be considered a violation of this policy.
- Understand that a violation of the EEO Policy can result in disciplinary action, up to and including dismissal; and that California law allows an employee to sue another employee for harassment based on a legally protected characteristic.



OPERATING POLICIES

O.P. NUMBER	TITLE	ISSUE DATE	REVISION DATE
H-07	Equal Employment Opportunity	4/29/98	11/5/12

RESPONSIBILITIES (continued)

- Cooperate in an investigation related to any complaint of a violation of this policy. Employees are prohibited from discussing the complaint outside of the investigation process, unless required or permitted by law, or authorized by the Legal Department or other appropriate authority. Failure to cooperate or deliberately providing false or misleading information during an investigation, or discussing the complaint outside of the investigative process, may be grounds for disciplinary action, up to and including dismissal.
- Understand and comply with the objectives of Metropolitan's nondiscrimination policies while performing day-to-day job duties and representing Metropolitan in business transactions.
- Not engage in behavior that could reasonably constitute retaliation of an employee, applicant, or contractor for alleging or opposing discrimination or harassment based on a legally protected characteristic, or participating in a related investigation or proceeding.
- Successfully and timely complete unlawful workplace harassment prevention training as mandated.

It is the responsibility of the **Employee Relations Section Manager** to:

- Supervise the activities of the EEO Investigations Staff.
- Enforce an EEO Policy which prohibits discrimination and harassment based on a legally protected characteristic.
- Maintain an internal complaint procedure for processing and investigating alleged violations of the EEO Policy.
- Receive and process internal complaints alleging a violation of this policy, and ensure that complaints are investigated as appropriate, promptly, thoroughly and impartially.
- Ensure that Metropolitan takes immediate and appropriate corrective action when it is determined that a violation of this policy has occurred.

It is the responsibility of the **Ethics Office** to:

- Coordinate with the EEO Investigations Staff or the Employee Relations Section Manager concerning allegations and complaints of discrimination or harassment received by the Ethics Office, including immediately reporting any conduct that may reasonably violate this policy to the EEO Investigations Staff or Employee Relations Section Manager. (If appropriate, such conduct may be reported outside of the Human Resources Group to the Legal Department.)



OPERATING POLICIES

O.P. NUMBER	TITLE	ISSUE DATE	REVISION DATE
H-07	Equal Employment Opportunity	4/29/98	11/5/12

RESPONSIBILITIES (continued)

It is the responsibility of the ~~Equal Employment Opportunity Manager~~ to:

- ~~Establish and maintain an EEO Policy which prohibits discrimination and harassment based on a legally protected characteristic.~~
- ~~Provide unlawful workplace harassment training to all employees.~~
- ~~With the Legal Department and in compliance with the Administrative Code, receive and respond to EEO related charges filed with state or federal agencies.~~
- ~~Establish and maintain an affirmative action plan and nondiscrimination program in accordance with applicable law.~~

REFERENCES

- ~~Administrative Code Sections 6219, 6300—6305, 7111—~~
- ~~Operating Policy H-03 and H-13~~
- ~~Affirmative Action Plan for Covered Veterans and Persons with Disabilities~~
- ~~Equal Employment Opportunity Policy Statement~~
- ~~Nondiscrimination Program~~
- ~~Applicable executive orders, federal, state, and local laws, statutes, and regulations~~
- ~~Discrimination Complaint Procedures~~
- ~~Applicable Metropolitan Board directives and policies~~
- ~~Memoranda of Understanding~~

APPROVAL

Original signed by Jeffrey Kightlinger 11/05/12
Jeffrey Kightlinger, General Manager Date