

NEEA'S STANDARDS OF BUSINESS CONDUCT

Updated February 1, 2023



NEEA expects all NEEA contractors and their employees, agents and subcontractors ("Covered Persons") to observe the highest standards of professionalism at all times, to comply with all laws applicable to our business whenever conducted, and to treat others in the workplace with dignity and respect.

Laws and Ethics

NEEA has a policy of strict compliance with all laws, which are applicable to our business, whenever and wherever conducted. Compliance with the law means not only observing the law, but also conducting our business affairs so that NEEA will be recognized as a law-abiding organization. It should never be assumed that NEEA's interest requires some other course of conduct. Moreover, no one has the authority to give any order or direction that would result in a violation of this policy.

In some instances, laws and regulations are ambiguous and difficult to interpret. In such cases, an individual working with NEEA should seek advice in order to assure that they are in compliance with this policy and are observing all applicable laws and regulations.

Whistleblowing

NEEA provides its employees, contractors, and other stakeholders with an avenue to, on an anonymous basis if needed, raise concerns or report any known or potential misconduct or violation of NEEA policies or applicable laws and regulations without retaliation or retribution.

A whistleblower is someone who reports an activity that may be considered illegal or dishonest.

Examples of illegal or dishonest activities are violations of federal, state, or local laws, billing or paying for services not performed, or for goods not delivered, and other fraudulent financial reporting. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate NEEA officials are charged with these responsibilities.

NEEA provides whistleblower protections in two important areas: confidentiality and retaliation. In so far as possible, NEEA will maintain the confidentiality of the whistleblower. However, NEEA may have to disclose identity to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense. NEEA will not retaliate against a whistleblower. The right of a

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whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Whistleblowers should report all activities they believe to be illegal or dishonest to NEEA Human Resources or the Executive Director. Individuals that are unable or unwilling to contact NEEA Human Resources or the Executive Director are encouraged to contact NEEA's anonymous reporting hotline through Lighthouse Services.

Anonymous Reporting Hotline

NEEA has an anonymous ethics hotline through Lighthouse Services where NEEA employees, contractors, and stakeholders can anonymously report any perceived illegal or dishonest activities. The hotline can be accessed through the following methods:

Lighthouse Services

844-490-0002

www.lighthouse-services.com/nea

Email: reports@lighthouse-services.com

Conflicts of Interest

NEEA expects Covered Persons to avoid Conflicts of Interest at all times. A "Conflict of Interest" occurs when a Covered Person has a financial or other interest of any kind, whether direct or indirect, that is substantial enough to reasonably affect their judgment regarding their obligations under any contract, their other business interests, or NEEA. Sometimes Conflicts of Interest will develop accidentally or unexpectedly.

Media

Covered Persons shall not speak to the media on behalf of NEEA, or regarding any NEEA-funded project, without prior approval from NEEA.

Political Activities

No Covered Persons are authorized to make political contributions or to engage in any political activity on behalf of NEEA.

Solicitation for Causes or Groups

NEEA expressly prohibits the use of NEEA's system to solicit NEEA employees or external parties or to distribute outside literature with the intent of solicitation. Solicitation includes such activities as requests for signatures, contributions for

charities, support of political or other organized activities, merchandise purchases and/or requests for donations.

Workplace Violence

NEEA does not tolerate acts of workplace violence or threats of violence committed by employees or Covered Persons against employees or any other Covered Persons, in connection with or related to the conduct of any NEEA business, wherever it may occur. NEEA may, out of business necessity, conduct an investigation related to reports of workplace violence. Following is a sample list of conduct that NEEA will not tolerate, to serve as a reference point:

Prohibited conduct includes, but is not limited to:

- Injuring another person physically;
- Engaging in behavior that creates a reasonable fear of injury in another person;
- Engaging in behavior that subjects another individual to extreme emotional distress;
- Possessing, brandishing, or using a weapon while on NEEA premises or engaged in NEEA business;
- Damaging property intentionally;
- Threatening to injure an individual or damage property; and
- Committing injurious acts motivated by, or related to, domestic violence, or sexual harassment.

Harassment, Discrimination, Sexual Assault, and Bullying

NEEA is committed to creating and maintaining a respectful, courteous work environment free of bullying, discrimination, and harassment or assault of any kind. The following section serves as our anti-harassment and discrimination policy and addresses prohibited conduct, including discrimination, harassment, and sexual assault, and explains the steps to take if an individual working with NEEA believes discrimination, harassment, and/or sexual assault has occurred or may occur.

Prohibited Conduct

NEEA expressly prohibits any form of discrimination, harassment, or assault based on race, color, national origin, ancestry, religion, age, gender, gender identification, sexual orientation, marital status, mental or physical disability, medical condition, genetic information, veteran status, or other protected status in accordance with applicable federal, state, and local laws. NEEA has no tolerance for any form of discrimination, harassment, or assault directed towards any employee, family member, visitor, or vendor. Not only is discrimination and harassment a breach of organizational policy, but it may also be a violation of state and/or federal law.

Defining Harassment

In general, prohibited harassment includes comments and behaviors that are directed against an individual based on protected status, qualities, and/or attributes.

Harassment is defined as behavior that: (1) is unwelcome; (2) has the purpose or effect of creating an intimidating, hostile, or offensive work environment; and (3) is sufficiently severe or pervasive to alter the conditions of employment for the targeted individual.

Sexual Harassment and Assault

Sexual harassment is defined as unlawful employment discrimination based on one's sex. There are two types of sexual harassment. The first, Quid Pro Quo Sexual Harassment, is defined as a situation in which an employer connects employment/job benefits with unwelcome sexual advances, sexual favors, or other physical or verbal sexual contact (e.g., linking promotions or the prevention of adverse outcomes with intimate relations with the employer). The second type, Hostile Work Environment, is harassment that is sufficiently severe to create an abusive work environment. This may include exposure to unwanted sexual advances, physical contact, sexual comments and jokes, sexual photographs, or other types of intimidating, hostile, or offensive actions or behavior.

Sexual harassment is illegal under Title VII of the Civil Rights Act. Harassment applies whether the person being harassed is a man or woman, or if both the harasser and victim are of the same gender. Examples of sexual harassment conduct include:

- Unwelcome or unwanted physical advances of a sexual nature, including touching, patting, slapping, pinching, brushing up against, hugging, cornering, kissing, fondling, and any other unacceptable physical contact.
- Requests or demands for sexual favors, consisting of subtle or obvious outcomes that are linked to an individual's employment status.
- Comments, gestures, noises, remarks, or jokes about a person's sexuality or sexual experience (directed at or made in the presence of any employee who indicates or has indicated in any way that such conduct in his or her presence is unwelcome).
- Any other type of sexually oriented behaviors that unreasonably interferes with another individual's work performance.

Further, sexual assault is defined as unwanted conduct of a sexual nature that is inflicted upon a person or compelled through the use of physical force, manipulation, threat or intimidation.

Mutually respectful interaction that is acceptable to all individuals is not classified as sexual harassment.

Other Forms of Harassment

Harassment does not have to be sexual in nature to create a hostile environment.

Other types of prohibited forms of harassment include:

- Verbal abuse, jokes, and offensive slurs based on religion, race, color, age, medical condition, national origin, marital status, sexual orientation, disability, or other legally protected status or characteristic.
- Displaying offensive pictures, cartoons, calendars, written jokes, or objects that are demeaning or hostile and are based on religion, race, color, age, medical condition, national origin, marital status, sexual orientation, disability, or other legally protected status or characteristic.
- Other offensive conduct (e.g., threats, pranks, or vandalism) relating to an individual's religion, race, color, age, medical condition, national origin, marital status, sexual orientation, disability, or other legally protected status or characteristic, all as defined and protected by applicable law.

Other terminable offenses related to harassment include, but are not limited to, the following:

- Knowingly making false allegations of sexual or other harassment;
- Breaking confidentiality when involved in any harassment investigation.

Such behaviors can occur in one-on-one interactions or in group settings. It is impossible to list every action or all language that a reasonable person could consider to be harassment. The examples provided above are not a complete list of unacceptable behaviors.

Bullying and Unprofessional Behavior Prohibited

In keeping with a respectful work environment, NEEA will not tolerate bullying or unprofessional behavior committed by employees or Covered Persons against employees or any other Covered Persons, in connection with or related to the conduct of any NEEA business, wherever it may occur. Bullying is defined as unwanted intentional written, verbal, nonverbal, or physical behavior, including but not limited to threatening, insulting, or dehumanizing gesture, by someone that has the potential to create an intimidating or offensive working environment or cause long-term damage, cause discomfort or humiliation, or unreasonably interfere with the individual's performance of his or her job. Such behavior may be on a one-time basis or be carried out repeatedly. Bullying may involve, but is not limited to unwanted teasing, demeaning, or belittling comments, threatening, intimidating, stalking, physical violence, or public humiliation. Any employee who feels he or she is the victim of bullying or intimidating behavior should immediately report that behavior according to the reporting process outlined in our anti-harassment policy above. The expectation at NEEA is that bullying behavior will not occur in any way, shape or form. All incidents of bullying behavior will be immediately addressed with consequences up to and including termination.

Reporting and Investigating Harassment, Discrimination, Sexual Assault, and Bullying

Any individual working with NEEA who feels that he or she has been the subject of harassment, discrimination, or sexual assault (or who has reason to believe that another

individual has been the subject of these activities) should notify Human Resources immediately. Alternatively, notification can be delivered to NEEA's Executive Director or NEEA's anonymous reporting hotline through Lighthouse Services.

NEEA will keep complaints confidential as far as reasonably possible, consistent with NEEA's responsibility to investigate the complaint and to take appropriate corrective action.

The complainant should include all information that the organization requests, including a detailed account of the incident(s), witnesses (if any), dates, and other information considered relevant. NEEA will conduct a prompt investigation. NEEA will investigate all complaints as discreetly and confidentially as possible.

The statute of limitations for alleging unlawful workplace harassment, discrimination and sexual assault conduct extends from one year to five years as of October 1, 2020 in the state of Oregon.