



Nondiscrimination Policy

Equal Employment Opportunity

The Company provides equal employment opportunities to all employees and applicants without regard to race, color, religious creed, sex, gender identity, national origin, ancestry, citizenship status, pregnancy, physical/mental/emotional ability/disability, age, military status or status as a Vietnam-era or special disabled veteran, marital status, registered domestic partner status, gender (including sex stereotyping), medical condition (including, but not limited to, cancer-related or HIV/AIDS-related) or sexual orientation in accordance with applicable federal, state and local laws. In addition, the Company complies with applicable state and local laws governing nondiscrimination in employment in every location in which the Company has facilities. This policy applies to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

Grantmaking

The Omaha Community Foundation (“OCF”) shall not contribute to any organization which attacks or maligns individuals or groups of individuals on the basis of perceived race, color, religion, national origin (including a Native American tribe), sex, sexual orientation, gender identity (as defined in paragraph 249(c)(4) of title 18, United States Code), age, marital or parental status, political affiliation, military service, physical or mental ability, or which act to prejudice those individuals or groups of individuals. This restriction applies in consideration of contributions to charitable organizations recommended by advisors of donor advised funds and in otherwise qualifying organizations to receive contributions from OCF.

Implementation:

1. Staff of OCF shall periodically review listings of charitable organizations that possibly attack or malign individuals contrary to OCF’s Nondiscrimination Policy, and develop an “Alert List” as to such organizations.
2. If OCF receives a grant recommendation or application for inclusion in OCF’s programs for an organization on the Alert List, the OCF’s Grants Manager will notify the Vice President of Community Investment to conduct an independent investigation as to the activities, mission and objectives of the organization. The Vice President of Community Investment may review information on the Southern Poverty Law Center (SPLC) web site for the organization in question. The Vice President of Community Investment shall also investigate the web site of the organization and other available information and documentation which describes

the activities, mission and objectives of the organization.



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3. Upon completion of investigation, if the Vice President of Community Investment determines that the activities, mission or objectives of the organization may not conform OCF's Nondiscrimination Policy, the Vice President of Community Investment shall prepare a report of his/her findings (the "Report"). The Report shall specify the sources of information concerning the organization and include a specific description of the activities, mission or objectives which might not conform with the Nondiscrimination Policy. The Vice President of Community Investment shall deliver the Report to the Vice President of Donor Services and CEO.
4. The CEO shall review the Report and may confer with the Vice President of Donor Services. The CEO shall then deliver the Report to the Governance Committee with the CEO's recommendation as to whether the activities, mission and objectives of the organization conform with OCF's Nondiscrimination Policy.
5. Based on the Report and the recommendation of the CEO, the Governance Committee shall finally determine whether or not the activities, mission and objectives conform with the Nondiscrimination Policy. If the organization does not conform with the Nondiscrimination Policy, OCF shall not make further grants or contributions to the organization, or include the organization in any programs sponsored by OCF.
6. OCF shall keep the Report, the recommendation of the CEO, and the decision of the Governance Committee confidential. To the extent that the staff needs to inform a donor or the organization, the staff may report that the organization does not meet the requirements for organizations which may receive contributions from OCF. Staff may refer to OCF's Nondiscrimination Policy, but shall not give specifics as to the reasons for OCF's determination.

Additional comment:

- The Grants Manager will coordinate a review of updates to the Southern Poverty Law Center-identified organizations in the spring annually. Their Web site contains a "search" mechanism for investigation of suspect organizations in the interim.

- The status of organizations determined to be disqualified under this policy will be reviewed annually.



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Anti-discrimination and Anti-harassment

It is the policy of the Company to maintain a working environment which encourages mutual respect, promotes respectful and congenial relationships between employees and is free from all forms of harassment of any employee or applicant for employment by anyone, including supervisors, co-workers, vendors, or customers. Harassment in any manner or form is expressly prohibited and will not be tolerated by the Company. Accordingly, Company management is committed to vigorously enforcing this policy against harassment, including but not limited to sexual harassment, at all levels within the Company.

All reported or suspected occurrences of harassment will be promptly and thoroughly investigated as deemed appropriate. Where harassment is determined to have occurred, the Company will immediately take appropriate disciplinary action.

The Company will not permit or condone any acts of retaliation against anyone who files harassment complaints or cooperates in the investigation of the same.

1. The term "harassment" includes but is not limited to unwelcome slurs, jokes, verbal, graphic or physical conduct relating to an individual's race, color, religious creed, sex, gender identity, national origin, ancestry, citizenship status, pregnancy, physical/mental/emotional ability/disability, age, military status or status as a Vietnam-era or special disabled veteran, marital status, registered domestic partner status, gender (including sex stereotyping), medical condition (including, but not limited to, cancer-related or HIV/AIDS-related) or sexual orientation.
2. Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature where:
 - a. Submission to such conduct is an explicit or implicit term or condition of employment.
 - b. Employment decisions are based on an employee's submission to or rejection of such conduct; or,
 - c. Such conduct interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

3. The term “harassment” may also include conduct of employees, supervisors, vendors and/or customers who engage in verbally or physically harassing behavior which has the potential for humiliating or embarrassing an employee of the Company.