



## POLICIES AND PROCEDURES

### CORPORATE POLICY

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Subject: Equal Employment Opportunity

Policy No.: 209

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#### A. **BACKGROUND AND PURPOSE**

The Foundation has a commitment to support and assist the educational mission of the California Polytechnic State University, Pomona and the laws of California and the United States which guarantee equal employment opportunity to all individuals. This commitment requires the Foundation and each of its departments, offices, and operations to treat all employees equally without regard to race, color, ancestry, religion, national origin, sex, gender, sexual preference, marital status, pregnancy, age, mental or physical disability, medical condition, veteran, disabled veteran or Vietnam era veteran's status. or any other protected status as defined by current laws. The Foundation will make positive efforts to increase the employment and advancement opportunities for women, members of minority groups, the disabled, disabled veterans and veterans of the Vietnam era, by establishing policies and procedures that works toward the employment of a workforce that reflects the diverse society served by the organization.

For this reason, the Board of Directors of the Cal Poly Pomona Foundation adopts the following Policy.

The Board of Directors adopted a basic policy and program statement concerning Nondiscrimination and Affirmative Action in employment in February 1980. This policy was amended on December 10, 1981, again on March 28, 1991 and January, 2011.



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Additionally, the Equal Employment Action Plan, as published and posted on Foundation's website, is the action plan regarding this policy.

### **B. BASIS FOR POLICY**

This policy is intended to conform to the requirements of the Federal Executive Orders 11246 and 11375 as amended; the Civil Rights Act of 1964 as amended; Title IX Educational Act of 1972; Sections 503 and 504 of the Rehabilitation Act of 1972; Sections 402 of the Vietnam Era Veterans Readjustment Assistance Act of 1974; Equal Pay Act of 1963 as amended; Age Discrimination Acts of 1967 and 1978 and other applicable Federal and State laws and regulations.

### **C. POLICY**

The Foundation, through responsible managers and supervisors, shall undertake a program of equal employment opportunity to further the principles of equal employment as delineated below, and as further outlined in the Plan and its Workbook:

- A. Recruit, hire, elevate, train and promote in all job titles and occupational categories without regard to any protected status such as race, color, ancestry, religion, national origin, sex, gender, sexual preference, marital status, pregnancy, age, mental or physical handicap, medical condition, disabled veteran, or veteran status.
- B. Ensure that other personnel actions such as compensation, benefits, layoffs, return from layoffs, Foundation sponsored training, educational reimbursement, social and recreation programs are administered without regard to any protected status.
- C. Identify and eliminate employment requirements and practices (such as unrealistic qualification standards or invalid pre-employment tests) which have an adverse impact on employment of veterans, women, minorities and others protected by EEO legislation and which do not have a clearly established relationship with job performance.
- D. Base employment decisions on the principles of equal employment opportunity including merit and valid job qualifications to enable qualified minority group members, women, disabled veterans and veterans of the Vietnam era, and other disabled persons to be introduced and maintained into the Foundation workforce.
- E. Initiate special recruitment efforts with minority, women, disabled, and veterans or Vietnam era veteran's organizations to attract qualified individuals from these groups for Foundation positions.
- F. Establish criteria to achieve a representation of minorities and women in the Foundation workforce that reasonably approximates the percentage of these groups which are available within the appropriate recruitment areas for specific occupational categories.

### **D. DISSEMINATION POLICY**

This Policy and the Action Plan will be disseminated externally and internally to effectively communicate its intent to the Foundation management staff and employees, recruiting sources and the general public. Policy dissemination shall occur in accordance with applicable guidelines and regulations.



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### E. RESPONSIBILITY FOR IMPLEMENTATION

- A. The Foundation Board of Directors has delegated the overall responsibility for the implementation of the program to the Foundation Chief Executive Officer. The CEO, in collaboration with the Chief HR Officer, has established a Equal Employment Opportunity Plan and the implementation plans are outlined in that Plan.
- B. The Foundation Chief Human Resources Officer will serve as Equal Employment Opportunity Facilitator, implement best practices, and provide counseling to managers, supervisors, and employees in EEO matters while ensuring compliance with EEO regulations and monitor progress in meeting affirmative action goals and timetables, as outlined in the Plan.
- C. The Facilitator will establish a reporting system which will include the following elements:
  - (1) Progress that is being made in respect to the achievement of affirmative action goals within each organizational unit.
  - (2) Discussions with department heads regarding any problems relating to the implementation of the Plan such as disparate impact on minority and women candidates as related to promotion patterns, rejection, ratios, etc.

### F. EMPLOYER STATUS

- A. It is a policy of the Foundation that all qualified employees receive full and equal consideration for promotion, transfer and upgrading. It is a Foundation objective to promote the best qualified employee without regard to any protected status such as race, color, ancestry, religion, national origin, sex, gender, sexual preference, marital status, pregnancy, age, mental or physical disability, medical condition, disabled veteran or Vietnam era veteran's status.
- B. Any workforce reductions and the recall of employees after such reductions will be applied without discrimination related to any protected status such as race, religion, color, sex, gender, age or national origin, etc.
- C. All employees will be compensated on the principle of equal pay for equal work performed and the amount of compensation for any specific job will be based on standards in the industry, the nature of the work performed and the qualifications and experience of the employee.

### G. EEO POLICY STATEMENT

It is the policy of Cal Poly Pomona Foundation to continue to provide equal employment opportunity to all applicants and employees without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, protected veteran status, or any other protected characteristic enumerated by federal or state law. Pursuant to Executive Order 11246, Section 503 of the Rehabilitation Act and the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA)., Cal Poly Pomona Foundation has developed programs to assist with the recruitment and advancement of individuals covered by these laws. These Programs have the full support of the CEO.

Cal Poly Pomona Foundation is committed to recruiting, hiring, training, and promoting persons in all job titles, as well as ensuring that all other personnel actions are administered, without regard to the protected characteristics outlined above. All employment decisions will be based on valid job requirements or other legitimate, non-discriminatory reasons. Our employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in activities such as: (1) filing a complaint; (2) assisting or participating in an



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investigation, compliance evaluation, hearing, or any other related activities associated with the administration of the plan provisions of the laws set forth above, or any other Federal, state, or local law requiring equal opportunity; (3) opposing any act or practice made unlawful by the laws set forth above or their implementing regulations, or any other Federal, state, or local law requiring equal opportunity; or (4) exercising any other right protected by the laws set forth above or their implementing regulations.

In addition, Cal Poly Pomona Foundation has designed and implemented an audit and reporting system that will: (1) measure the effectiveness and compliance of our Programs; (2) indicate any need for remedial action; (3) determine the degree to which objectives have been attained; (4) determine whether individuals with protected characteristics have had the opportunity to participate in all company-sponsored educational, training, recreational, and social activities; (5) measure our compliance with the Programs' specific obligations; and (6) document the actions taken to perform items (1) through (5) above. If, after performing this audit, we determine that our Plans are deficient, we will undertake necessary action to bring our Programs into compliance.

Cal Poly Pomona Foundation is also committed to abiding with the Pay Transparency Nondiscrimination Provisions and therefore, will not retaliate or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other Enterprises employees or applicants as a part of their essential job functions (such as those employees who have administrative privileges in the payroll system, budgeting systems or any employee working in Human Resources) cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing or action, including an investigation conducted by the Enterprises, or (c) consistent with the Enterprises' legal duty to furnish information.

The CEO and or their designee has the responsibility for ensuring full compliance with the provisions of the above-referenced laws and other applicable directives. Responsibility for implementing and monitoring these Programs is assigned to the Chief Human Resources Officer. Our Plans for Individuals with a Disability and Protected Veterans are available to applicants and employees, upon request, on regularly scheduled workdays by contacting the Chief Human Resources Officer who serves as our EEO Officer. Any applicant or employee who has a disability and needs access to this Policy Statement in a different format should contact the Chief Human Resources Officer. In addition, employees may voluntarily self-identify as an individual with a disability or a protected veteran at any time by contacting the Chief Human Resources Officer.

If you have any questions regarding our harassment policies or the complaint procedure, you may contact Shari Benson at 909.869.2948.

Signature: Jared Ceja  
Jared Ceja, CEO  
Cal Poly Pomona Foundation, Inc.

Date: March 1, 2024