

# **CORE CODE OF CONDUCT**

As of 09/14/2020

## **OVERVIEW**

Standards of conduct are necessary for the successful operation of CORE business and for the safety and comfort of all employees. All employees of CORE are expected to comply with Company rules and applicable law. All CORE employees are responsible for adhering to CORE policies, rules, directives and procedures.

Employment with CORE is at-will. The Company reserves the right in its sole discretion to issue any type of disciplinary action in response to any conduct violations or performance issues. The types of disciplinary action that may be issued, in any order, include the following: verbal or written reprimand, pay reduction, disciplinary demotion, suspension with or without pay and termination of employment. However, no particular disciplinary step(s) need be taken prior to terminating an employee, as all employees are employed at-will and thus may be terminated or quit with or without notice or cause.

All disciplinary procedures are determined and utilized within the sole discretion of CORE management.

# STANDARD OF CONDUCT

The following conduct is prohibited and will not be tolerated by CORE. This statement of prohibited conduct does not alter CORE's policy of at-will employment. This list of prohibited conduct is illustrative only and is not intended to be exclusive; such rules cannot identify every type of unacceptable conduct and performance. All conduct injurious to the security, safety and welfare of CORE employees and/or CORE operations is prohibited. Such conduct includes, but is not limited to:

- 1. Willful or negligent violation of CORE policies and procedures, operating rules or related directives.
- 2. Failure to carry out a direct order from a superior regarding job duties, except where the employee's safety may reasonably be jeopardized by the order.
- 3. Negligence in the performance of duties or unsatisfactory job performance, including failure to perform assigned tasks or training or failure to discharge duties in a prompt and efficient manner; failure or refusal to improve job performance in accordance with written or verbal direction.
- 4. Engaging in conflict of interest activity.
- 5. Engaging in unlawful conduct during working time or on Company premises or in relation to another employee.
- 6. Knowingly falsifying, removing or destroying information related to CORE business employees, payroll or work-related records or reports, including materials prepared or submitted in connection with applying for a position with CORE.
- 7. Violation or neglect of safety rules or contributing to hazardous conditions; Failure to promptly report a work-related injury or accident.
- 8. Theft or unauthorized removal or use of CORE property or that of its clients, customers, agents, etc.
- 9. Any act or conduct that violates CORE's policy against discrimination and harassment, including conduct that is discriminatory, harassing, abusive or violent in nature toward another person. This includes bullying, threatening or intimidation.
- 10. Engaging in or threatening violence against CORE and/or any of its principals, employees, customers or agents; Provoking and/or engaging in physical fighting during work hours or on CORE property.
- 11. Using abusive language at any time while performing duties for CORE or while on CORE premises.

- 12. Making malicious, false or derogatory statements that may damage the integrity or reputation of CORE or an employee.
- 13. Engaging in unlawful unfair competition and/or disclosure of CORE trade secrets, proprietary and/or confidential information.
- 14. Participating in horseplay or practical jokes on CORE time or on CORE premises.
- 15. Driving under the influence of alcohol or drugs while on duty; suspension of driver's license where job duties require driving.
- 16. Careless, negligent or improper use of CORE property, equipment or funds, including unauthorized risk of damage to property; Use of CORE vehicles without prior approval or unlawful operation of said vehicles.
- 17. Gambling or engaging in games of chance while on CORE time or on CORE premises.
- 18. Sleeping, feigning illness, or general avoidance of work while on the job.
- 19. Misrepresentation or withholding of pertinent facts in securing employment.
- 20. Possession, display, threatening to use or actual use of explosives, firearms or other dangerous weapons or materials while on the job or on CORE property.
- 21. Committing a fraudulent act or a breach of trust under any circumstances affecting CORE.
- 22. Failure to comply with all human trafficking and abuse laws, and failure to report any alleged violations to legal authorities in accordance with the law.
- 23. Employees should not use their positions, titles, services or access to amenities in any manner that could be considered to create an actual or potential conflict of interest or ethical violation. For example, employees should not offer members of the public preferential treatment for any reason. Employees should not engage in any confidential or side transaction with members of the public related to their job duties.
- 24. Failure to comply with the CORE appearance policy. Specifically, employees should not wear any attire (t-shirts, sweatshirts, masks, hats) that contain images or language that is harassing, discriminatory, obscene, violent, threatening or abusive.

# POLICY PROHIBITING DISCRIMINATION, HARASSMENT, AND RETALIATION

#### DISCRIMINATION

CORE does not tolerate discrimination against our job applicants, interns, volunteers, or employees by another employee, supervisor, vendor, customer, or any third party on the basis of the following legally protected actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or gender expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, protected medical condition as defined by applicable state or local law, genetic information, or any other characteristic protected by applicable federal, state, or local laws and ordinances (referred to as "protected characteristics"). CORE also prohibits retaliation as defined below.

CORE is committed to a workplace free of discrimination and retaliation. These behaviors are prohibited in the workplace and in any work-related settings such as business trips and Company sponsored social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party. In addition to being a violation of this policy, discrimination, harassment or retaliation based on any protected characteristic as defined by applicable federal, state, or local laws and ordinances also is unlawful. For

example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment as defined by applicable federal, state, or local laws and ordinances are unlawful.

#### SEXUAL AND OTHER UNLAWFUL HARASSMENT

The Company is committed to providing a work environment that is free of prohibited harassment. As a result, the Company maintains a strict policy prohibiting sexual harassment and harassment against applicants and employees based on any legally-recognized status, including, but not limited to: race, color, religion, sex, pregnancy (including lactation, childbirth or related medical conditions), sexual orientation, gender identity, age (40 and over), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status or any other status protected by federal, state or local law.

The Company's anti-harassment policy applies to all persons involved in its operations, regardless of their position, and prohibits harassing conduct by any employee of the Company, including supervisors, managers and nonsupervisory employees. This policy also protects employees from prohibited harassment by third parties, such as customers, vendors, clients, visitors, or temporary or seasonal workers. If such harassment occurs in the workplace by someone not employed by the Company, the procedures in this policy should be followed. The workplace includes: actual worksites, any setting in which work-related business is being conducted (whether during or after normal business hours), company-sponsored events, or company owned/controlled property.

#### SEXUAL HARASSMENT DEFINED

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.
- Sexual harassment includes various forms of offensive behavior based on sex. The following is a non-exhaustive list of the types of conduct prohibited by this policy:
- Unwanted sexual advances or propositions (including repeated and unwelcome requests for dates);
- Offers of employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages;
- Verbal conduct: making or using sexually derogatory comments, innuendos, epithets, slurs, sexually
  explicit jokes, or comments about an individual's body or dress, whistling or making suggestive or
  insulting sounds;
- Verbal and/or written abuse of a sexual nature, graphic verbal and/or written sexually degrading commentary about an individual's body or dress, sexually suggestive or obscene letters, notes, invitations, emails, text messages, tweets or other social media postings;

- Physical conduct: touching, assault or impeding or blocking normal movements;
- Retaliation for making reports or threatening to report sexual harassment.

#### OTHER TYPES OF HARASSMENT

Harassment on the basis of any legally protected status is prohibited, including harassment based on: race, color, religion, sex, pregnancy (including lactation, childbirth or related medical conditions), sexual orientation, gender identity, age (40 and over), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status or any other status protected by federal, state or local law. Prohibited harassment may include behavior similar to the illustrations above pertaining to sexual harassment. It also includes, but is not limited to:

- Verbal conduct including taunting, jokes, threats, epithets, derogatory comments or slurs based on an individual's protected status;
- Visual and/or written conduct including derogatory posters, photographs, calendars, cartoons, drawings, websites, emails, text messages or gestures based on an individual's protected status; and
- Physical conduct including assault, unwanted touching or blocking normal movement because of an individual's protected status.

# Manager's Responsibility

All supervisors and managers are responsible for:

- Implementing this policy, which includes, but is not limited to, taking steps to prevent harassment and retaliation:
- Ensuring that all employees under their supervision have knowledge of and understand this policy;
- Promptly reporting any complaints to the designated Human Resources Representative so they may be investigated and resolved in timely manner;
- Taking and/or assisting in prompt and appropriate corrective action when necessary to ensure compliance with this policy; and
- Conducting themselves, at all times, in a manner consistent with this policy.

Failure to meet these responsibilities may lead to disciplinary action, up to and including termination.

#### PROTECTION AGAINST RETALIATION

Retaliation is prohibited against any person by another employee or by the Company for using this complaint procedure, reporting proscribed harassment, objecting to such conduct or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Individuals who believe they have been subjected to retaliation, or believe that another individual has been subjected to retaliation, should report this concern to the ranking on-site supervisor or manager or to any Human Resources Representative by emailing hr@coreresponse.org. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation prohibited by this policy is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken. If a complaint cannot be substantiated, the Company may take appropriate action to reinforce its commitment to providing a work environment free from retaliation.

#### GOOD FAITH

The initiation of a good faith complaint of harassment or retaliation will not be grounds for disciplinary action, even if the complaint allegations cannot be substantiated. However, any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination.

#### SUPPORT FOR INDIVIDUALS IMPACTED BY HARASSMENT OR RETALIATION

The Company will strive to assist anyone who has been subjected to unwelcome harassment or retaliation to feel more comfortable in the work environment. Such assistance may, but does not necessarily, include transfer or reassignment. Any such assistance is at the Company's sole discretion.

#### REPORTING PROCEDURES

The following steps have been put into place to ensure the work environment at CORE is respectful, professional, and free of discrimination, harassment and retaliation. If an employee believes someone has violated this policy, the employee should promptly bring the matter to the immediate attention of the Company's Supervisor, Site Manager, Area Manager or Human Resources. If either of these parties is the person toward whom the complaint is directed, you should contact any higher-level manager in your reporting chain. If the employee makes a complaint under this policy and has not received an initial response within five (5) business days, the employee should contact the Company's Director of Human Resources immediately by emailing hr@coreresponse.org.

Every supervisor who learns of any employee's concern about conduct in violation of this policy, whether in a formal complaint or informally, or who otherwise is aware of conduct in violation of this policy must immediately report the issues raised or conduct to senior management or to Human Resources.

# **INVESTIGATION PROCEDURES**

Upon receiving a complaint, the Company will conduct a timely, objective and thorough investigation into the facts and circumstances of any claim of a violation of this policy to ensure due process for all parties. To the extent possible, the Company will endeavor to keep the reporting employee's concerns confidential. However, complete confidentiality may not be possible in all circumstances.

During the investigation, the Company generally will interview the complainant and the accused, conduct further interviews as necessary and review any relevant documents or other information. Upon completion of the investigation, the Company will determine whether this policy has been violated based upon its reasonable

evaluation of the information gathered during the investigation. The Company will inform the complainant and the accused of the results of the investigation.

The Company will take corrective measures against any person who it finds to have engaged in conduct in violation of this policy, if the Company determines such measures are necessary. These measures may include, but are not limited to, counseling, suspension, or immediate termination. Anyone, regardless of position or title, whom the Company determines has engaged in conduct that violates this policy will be subject to discipline, up to and including termination. This includes individuals engaging in discrimination, harassment or retaliation, as well as supervisors who fail to report violations of this policy, or knowingly allow prohibited conduct to continue. Individuals who engage in conduct that rises to the level of a violation of law can be held personally liable for such conduct.

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The Company cannot remedy claimed discrimination, harassment or retaliation unless employees bring these claims to the attention of management. Employees should report any conduct which they believe violates this policy.

#### PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE

CORE provides humanitarian assistance to beneficiaries who depend on our services for their well-being. Employee are prohibited from engaging in any acts of sexual exploitation or abuse. Sexual exploitation is defined as an actual or attempted abuse of someone's position of vulnerability, differential power or trust to obtain sexual favors by offering money, social or economic advantages in exchange. Examples of such exploitation include but are not limited to offering services, rations, or compensation in exchange for sexual favors. The policy applies to trafficking and prostitution. Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force, or under unequal or coercive conditions. It includes sexual slavery, pornography, child abuse and sexual assault.

All reports of the violation of this policy will be investigated immediately.

Employees who engage in such conduct will be subject to disciplinary action, termination and will be reported to the legal authorities.

Employees who have information regarding such conduct by other employees should contact Human Resources and make a report immediately. Managers who have information regarding such conduct are required to make a report to Human Resources immediately.

# WORKPLACE VIOLENCE

CORE is committed to providing a workplace that is free from acts of violence or threats of violence. In keeping with this commitment, CORE has established a policy that provides "zero tolerance" for actual or threatened violence against employees, customers, visitors, or any other person who has contact with employees in the

course of their duties. Security and safety in the workplace are every employee's responsibility. It is therefore essential that every employee understand the importance of workplace safety and security.

The welfare of our employees and the security of CORE facilities require that every individual be aware of potential security risks. Employees should immediately notify their supervisor or Human Resources if they see any person acting in a suspicious manner, in or around CORE premises.

Every verbal or physical threat of violence will be treated seriously by CORE. Any such threat should be immediately reported to a supervisor or Human Resources. Where a violation of this policy is found to exist, CORE will take appropriate corrective action. In situations where an employee becomes aware of an imminent act of violence, a threat of imminent violence, or actual violence, emergency assistance must be immediately sought. In such situations, the employee should immediately contact their supervisor or Human Resources and, if necessary and appropriate, law enforcement authorities by dialing 911.

Third parties, including but not necessarily limited to, volunteers, interns, and vendors are prohibited from engaging in harassing, discriminatory, abusive, obscene, threatening or violent conduct. Anyone witnessing or experiencing such conduct from a third party should report the conduct immediately. CORE will take action to prevent such prohibited conduct, including making a request that the third party change their conduct or leave the premises immediately.

Full cooperation by all employees is necessary for CORE to accomplish its goal of maximizing the security and safety of its employees. Employees should direct any questions they have regarding their rights and obligations under this policy to Human Resources.

## CONFLICTS OF INTEREST

All full-time employees of CORE are expected to devote their best efforts to the performance of their jobs. Moreover, employees are expected to use good judgment, to adhere to high ethical standards, and to avoid situations that create an actual or potential conflict between their personal interests and their ability to complete their job duties for CORE.

A conflict of interest exists when the employee has personal interests that may impact the employee's ability to complete job duties objectively, effectively and efficiently. Both the fact and the appearance of a conflict of interest through unauthorized conduct must be avoided. An employee involved in any relationship or situation described in this policy must immediately and fully disclose the relevant circumstances to Human Resources.

While it is not feasible to describe all possible conflicts of interest that could develop, some of the more common conflicts are listed below. Except with the specific approval of CORE, or as permitted by this policy, CORE employees are prohibited from:

 Accepting any personal gift, gratuity, entertainment or unusual gain from competitors, customers, vendors, suppliers, or business associates, except as specifically authorized by the terms of this policy. "Unusual gain" includes any tangible thing, money, service, discount, benefit, or favor made available to an employee from any outside person or entity, offered to the employee, or any person related to the employee, as a consequence of employment with CORE.

- 2. Working for a competitor, vendor, supplier, or customer.
- 3. Engaging in self-employment in competition with CORE.
- 4. Using CORE proprietary or confidential information for personal gain or to CORE's detriment, or for any purpose not necessary in the approved course and scope of the performance of the employee's duties for CORE.
- 5. Using CORE property or labor for personal gain, or for any purpose not necessary in the approved course and scope of the performance of the employee's duties for CORE.
- 6. Developing a romantic relationship with a subordinate employee of CORE, or with an employee of a competitor, supplier, vendor or customer, that might interfere with the exercise of impartial judgment in decisions affecting CORE or any employee of CORE.

CORE wishes to prevent any actual or potential conflict of interest that may affect CORE business or employee morale. Personal or romantic involvement with a competitor, customer or supplier of CORE, which impairs an employee's work or ability to exercise good judgment on behalf of CORE, creates an actual or potential conflict of interest. In the event that an employee begins dating or develops a romantic relationship with a competitor, customer or supplier, the employee will not be permitted to work directly with that individual. Furthermore, if, in the sole and exclusive judgment of management, the relationship gives rise to an actual conflict that cannot be reasonably accommodated by CORE without undue hardship, the employee will not be permitted to remain with CORE.

Supervisor-subordinate romantic or personal relationships can also lead to supervisory problems, possible claims of sexual harassment and/or morale problems. In the event that two employees begin dating or develop a romantic relationship, they will not be permitted to work in the same department and neither will be permitted to supervise, evaluate or otherwise affect any decision about the other concerning promotion, retention, compensation or other career development issues. Furthermore, if, in the sole and exclusive judgment of management, the relationship gives rise to an actual conflict that cannot be reasonably accommodated by CORE without undue hardship, only one of the employees will be permitted to remain with CORE. The decision as to which employee will remain must be made by the two employees. If no decision has been made by the employees within seven (7) days after being notified by management, management may, in its sole and exclusive discretion, terminate either or both employees.

Gifts and hospitality provided by CORE employees to third parties at CORE expense must be reasonably and directly related to a legitimate business purpose. Provision of such gifts is only permitted with the prior written approval of CORE management.

If an actual or potential conflict is determined to exist, CORE may take any corrective action that it deems appropriate under the circumstances. Failure to adhere to this Conflicts of Interest policy, including failure to disclose any conflicts, to seek prior approval, or to seek an exception, may result in disciplinary action up to and including termination of employment.

# **OFF-DUTY CONFLICT**

The Company respects each employee's right to engage in activities outside of employment such as those that are of a personal or private nature, to the extent that such activities do not create a conflict of interest as described in the Conflicts of Interest policy set forth in this Handbook or adversely affect the employee's ability

to perform their job. Under certain circumstances, however, if an employee's personal conduct adversely affects performance on the job or makes it impossible for the employee to carry out any or all job duties while at work, appropriate disciplinary action up to and including termination of employment may be appropriate.

The following types of outside employment are strictly prohibited:

- 1. Employment that conflicts with an employee's work schedule, duties and responsibilities.
- Employment that creates a conflict of interest or is incompatible with the employee's employment with CORE.
- 3. Employment that impairs or has a detrimental effect on the employee's work performance with CORE.
- 4. Employment that requires the employee to conduct work or related activities on CORE property during the employee's working hours or while using CORE facilities and/or equipment.
- 5. Employment that directly or indirectly competes with the business or the interest of CORE.

Employees who wish to engage in outside employment that may create an actual or apparent conflict of interest must submit a written request to Human Resources explaining the details of the outside employment to ensure that it will not interfere with your job at CORE or pose a conflict of interest.

| CERTIFICATION                             |   |
|---|---|
| 1,  | _ (please print your name), hereby acknowledge that I have reviewed |
| the Code of Conduct.                      |   |
| I further confirm that I will comply with | n the policies described in the Code of Conduct.                    |
| Signature                                 |   |
| Date                                      |   |