

Holy Cross Energy Corporate Policies

Equal Employment Opportunity and Nondiscrimination

Policy Number: 3.1

Original Effective Date: November 18, 2015

Revised Dates: November 19, 2025

1. OBJECTIVE

1.1 To present a comprehensive statement of Holy Cross Electric Association, Inc., a/k/a Holy Cross Energy's ("Holy Cross") policy of equal employment opportunity and nondiscrimination through equal opportunity.

2. POLICY

2.1 The Board of Directors ("Board") of Holy Cross adopts and reaffirms the following Corporate Policy ("Corporate Policy" or "Policy") statements concerning equal employment opportunity, nondiscrimination and unlawful harassment:

2.1.1 It is the policy of Holy Cross not to discriminate and to provide equal employment opportunity to all qualified persons regardless of age 40 and over, color, disability, gender identity, genetic information, military or veteran status, national origin, race, religion, sex, sexual orientation or any other applicable status protected by federal, state, or local law.

2.1.2 It is the policy of Holy Cross to prohibit unlawful harassment of any person by another person, including verbal or physical conduct which has the purpose or effect of substantially interfering with an individual's work performance, or which is intended to create an intimidating, hostile, or offensive work environment.

2.1.3 These Policies are applied to all workplace interactions and employment actions, including, but not limited to, recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, and selection for training including apprenticeship.

2.1.4 These Policies apply to all employees, including management, supervisors, co-workers, and non-employees such as customers, clients, vendors, consultants, etc.

2.1.5 Holy Cross will make reasonable accommodation for qualified individuals with known disabilities and employees whose work requirements interfere with a religious belief unless doing so would result in an undue hardship or a direct threat to Holy Cross. Employees needing such accommodations are instructed to contact their supervisor or the Human Resources Department immediately.

2.1.6 Holy Cross will not discharge 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 employees or applicants as a part of their essential job functions 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 employer, or (c) consistent with Holy Cross's legal duty to furnish information pursuant to 41 CFR 60-1.35(c).

2.1.7 Holy Cross is committed to the principles of Equal Employment Opportunity ("EEO") and Affirmative Action. In support of these principles, Holy Cross has developed written Affirmative Action Plans ("AAP") for women, minorities, individuals with disabilities, and covered Veterans. Holy Cross's AAP for Veterans and the Disabled is available in the Holy Cross offices during regular office hours or by appointment.

2.1.8 Holy Cross's EEO/AAP Officer is its Human Resources Director, located at 3799 Highway 82, Glenwood Springs, Colorado 81602, (970) 945-5491 The EEO/AAP Officer is responsible for

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compliance with state and federal EEO laws and AAP regulations, and is also responsible for implementing Holy Cross's AAP, including equal employment practices monitoring and internal reporting. If you believe you have not been treated in accordance with this Policy, please contact the EEO/AAP Officer. All employees and applicants for employment are protected, by both Holy Cross's policy and EEO/AAP regulations and law, from coercion, intimidation, interference, or discrimination for filing a complaint or assisting in an investigation.

2.1.9 The person responsible for coordinating this organization's non-discrimination compliance efforts is Holy Cross's EEO/AAP Officer. Any individual, or specific class of individuals, who feels that Holy Cross has subjected them to discrimination may obtain further information about the statutes and regulations listed above from or file a written complaint with this organization; the Colorado Department of Labor, or the U.S. Equal Employment Opportunity Commission. Complaints must be filed within 180 days after the alleged discrimination. Confidentiality will be maintained to the extent possible. Holy Cross is an equal opportunity provider and employer.

3. RESPONSIBILITY

3.1 The Board shall be responsible for the administration of and compliance with this Policy.

3.2 The President and CEO shall ensure this Policy is adhered to by Holy Cross employees.

3.3 The Human Resources Director shall serve as Holy Cross' EEO/AAP Officer and shall be responsible for the conduct of Holy Cross' equal employment opportunity and nondiscrimination programs.