

Inclusion Code of Conduct Policy

Effective Date: April 27, 2022

Introduction

NAWBO is committed to creating an inclusive environment for everyone. Our collective success depends on embracing and celebrating the unique experiences, perspectives, and cultural, ethnic, and other backgrounds that each of us brings to the organization for the purpose of coming together and building relationships that help all of us grow as leaders and business owners.

We strive to foster an environment where everyone affiliated with NAWBO feels respected, valued, and empowered, and all are invested in helping us promote and sustain an inclusive organization.

This policy is based on our vision, mission, Diversity Statement, and a shared commitment to serve the NAWBO community. While NAWBO is an organization that advocates for womenowned businesses, it is also an inclusive organization, and we welcome, and seek to include, needed and underrepresented voices.

NAWBO Diversity Statement

In principle and in practice, NAWBO values and seeks a diverse and inclusive membership. NAWBO seeks full participation in the organization by all business owners who support our mission to empower women entrepreneurs, regardless of race, religion, age, sexual orientation, national origin or disability. NAWBO's goal is to effectively represent the full diversity of the women business owner community and to expand access to leadership opportunities across the full spectrum of our membership.

Commitment to Inclusiveness

NAWBO is committed to taking the following actions in support of an inclusive organization at the National and local levels:

- Provide ongoing education and training to all members, National and local leaders, and headquarter staff on diversity, equity, inclusion, and belonging (DEI&B) topics
- Support the creation and operation of a DEI&B committee comprising National board members and chapter members from around the country
- Provide all constituents with a safe avenue to voice concerns regarding DEI&B in our organization
- Conduct periodic member surveys and focus groups to identify the areas where our organization supports inclusive practices, as well as where there is opportunity for growth

Shared Applicability & Accountability

NAWBO will not tolerate discrimination, harassment, retaliation, or any behavior or language that is abusive or unlawful from any member, National or local leader, headquarter staff, or partner, and all are expected to support an inclusive organization by adhering to the following standards of conduct. We seek to build an inclusive culture by providing these examples, however, this is not an all-inclusive list:

- Treat others with dignity and respect at all times
- Promptly address and report inappropriate behavior and comments that are discriminatory, harassing, retaliatory, or abusive
- Foster teamwork and member participation, encouraging the representation of different member perspectives
- Seek out insights from members with different experiences, perspectives, and backgrounds
- Avoid slang or idioms that might not translate across cultures
- Acknowledge the decisions or behaviors of others that are based on conscious or unconscious biases and discuss alternatives
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct
- Be committed to ongoing education and training to proactively identify self-awareness
- When self-awareness or circumstances indicate a need for improvement, take timely, relevant, and good faith actions to learn and grow

We appreciate objective feedback from our members, and invite you to participate in DEI&B programming, surveys, and other activities designed to proactively capture information to help achieve our vision, mission, and Diversity Statement, as well as to better understand how we are doing.

Violations

The following are examples of actions or behaviors that, if found through an objective investigation, may result in corrective action (see more on corrective actions under "Sanctions"):

- 1) Conduct which adversely affects members, headquarter staff, or partners.
- 2) Conduct which causes significant, negative interference to organization operations.
- 3) Conduct which adversely affects the organization's commitment to creating a diverse, equitable, inclusive, and belonging environment
- 4) Derogatory conduct such as:
 - a. Verbal epithets, slurs, or negative stereotyping.
 - b. Physical or verbal threats, or physical assault of any kind.
 - c. Outbursts of anger, shouting, or profanity directed toward others.
 - d. Comments, jokes, gossip, gestures, or criticisms that have the effect of unlawfullydisparaging or unnecessarily or purposefully humiliating others.
 - e. Circulation or display of written or graphic material that sexually or otherwise objectifies, denigrates, or shows hostility or aversion toward an individual or a group.
 - f. Unwanted sexual advances, pressure for dates or sexual favors, and other verbal orphysical harassment of a sexual nature.
 - g. Behaviors that exclude, silence, isolate, undermine, or sabotage an individual.

Reporting a National Violation

Members, National or local leaders, headquarter staff, or partners are expected to report incidents that violate this policy by contacting the DEI&B Hotline at NAWBO's **toll-free number** – **800.556.2926** or on the online NAWBO Incident Reporting Form.

Reportable National violations include any incident that occurs with a National board member, HQ Staff member or vendor, PASC member, or at a National event: Leadership Academy, National Women's Business Conference, Advocacy Days, etc.

Reporting a Chapter Violation

Members, local leaders, staff, or partners are expected to report incidents that violate this policy by contacting the chapter's DEI&B Chair. If the chapter does not have a DEI&B Chair, it can designate a Board or Committee leader who will spearhead the reporting and resolution process. If a chapter cannot resolve or needs additional assistance, it can contact the NAWBO HQ DEI&B committee or report on the National DEI&B Hotline listed above. See Chapter DEI&B Contact Information Sheet Attached.

Reportable chapter violations include any incident that occurs within the chapter board, or with a chapter member, staff or vendor, etc.

Formal Reporting Process

NAWBO encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. While no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents.

To ensure all reported incidents are handled in a timely, objective, and impartial manner, we will use the following process when an incident is reported:

Notification & Timing

The individual reporting the incident will:

- Be notified of NAWBO's receipt of the incident report within three (3) business days.
 The notification will include date and time of receipt, and an estimated timeframe for review
- Be notified with an updated timeframe if more time than anticipated is needed to review and determine the nature of the incident.
- Conflict resolution session between parties if appropriate. If conflict cannot be resolved, then investigation process may be necessary.
- Be invited to participate in the investigation process and will be expected to fully cooperate and provide necessary, factual information to facilitate the process.

The alleged offender will:

- Be notified of NAWBO's receipt of an incident report.
- Be invited to participate in the process and will be expected to fully cooperate and provide necessary, factual information to facilitate the process.

Both parties:

- Will receive a copy of this policy.
- May submit questions regarding timing or status of the investigation of the incident
 after it has been reported to deib@nawbo.org. The toll-free hotline is for reporting
 policy violations only. See attached Chapter DEIB Contact information sheet for
 Chapter investigations.
- Will be contacted to discuss the outcome of the reported incident. Keep in mind that to
 preserve the integrity of the investigation and confidentiality for all parties, we may not
 be able to share names and other identifying information of any witnesses or other
 information.

All NAWBO members may submit general questions about DEI&B to deib@nawbo.org.

Confidentiality & Cooperation

- For the integrity of the investigation, all reported incidents will be kept confidential to the extent practicable.
- We appreciate your cooperation with maintaining confidentiality to ensure the integrity of any investigative process.

Sanctions

Members, National or local leaders, headquarter staff, or partners who violate this policy will face appropriate corrective action. Potential consequences can include, but not be limited to, additional training, leader development training, conflict resolution session, verbal and written warnings, removal from a volunteer position, suspension, and termination of membership, employment, or partnerships.

Reports determined to be false and made with malice will result in consequences to the reporter. Conversely, reporters shall bear no consequences if their good-faith report is determined to not violate the Inclusion Code of Conduct. NAWBO strictly prohibit retaliation.

Note: Severity of the consequence will depend on the severity of the violation and if the alleged offender has repeatedly been sanctioned.

Appeals Process

After receiving a summary of findings and decisions, all individuals involved in Inclusion Code of Conduct reported violations will have up to 15 business days to file an appeal <u>based on new evidence</u> and must include a written narrative justification for the appeal.

For a **National violation**, the process is as follows:

- Appeal filed with National Board Chair (or with the Chair Elect if the Chair is implicated in the complaint or has been recused for any reason)
- The Chair will appoint an Appeals Panel, consisting of three Board members who are not implicated in the complaint and have no conflicts of interest with respect to any of the parties involved, to review the appeal.
- They will review all documentation from the original complaint as well as the new evidence, and will recommend one of the following:
 - Uphold the original decision and sanctions;
 - Uphold the original decision, but revise the sanctions; or
 - Revise the original design and sanctions.
- A member of the Appeals Panel will share the final recommendations with the complainant(s) and individual(s) involved in the reported violations.

For a **Chapter violation**, the process is as follows:

- Appeal filed with Chapter President (or with the Chapter President Elect if the Chair is implicated in the complaint or has been recused for any reason)
- The President will appoint an Appeals Panel, consisting of three Board members who are not implicated in the complaint and have no conflicts of interest with respect to any of the parties involved, to review the appeal.
- They will review all documentation from the original complaint as well as the new evidence, and will recommend one of the following:
 - Uphold the original decision and sanctions;
 - Uphold the original decision, but revise the sanctions; or
 - Revise the original design and sanctions.
- A member of the Appeals Panel will share the final recommendations with the complainant(s) and individual(s) involved in the reported violations.

Effective Date

This policy is effective April 27, 2022. The online version will be the most recent and will supersede any hard copies. Reported incidents that are in process of investigation as of the policy effective date or were previously reported and resolved prior to the policy effective date, are not included under this policy.

Questions

Send any questions regarding this policy to deib@nawbo.org

Chapter DEI&B Contact Information and Reporting Process

Contact Information To Be Updated Annually

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