

## **Labor Code of Conduct**

It is Westcliff policy that all employment comply with relevant federal, state, and local labor codes, all laws and regulations under the EEOC for Equal Pay/Compensation Discrimination, and all FLSA laws and regulations. Corporate Human Resources advises on policy and is responsible for counseling, monitoring, and administering all policies and procedures to ensure fair and ethical working conditions and practices. Westcliff also requires vendors to comply with the university's labor code requirements.

### ***Women's Rights***

a) Women workers must receive equality with male workers regarding remuneration, including benefits; equal treatment; equal evaluation of the quality of their work; and equal opportunity to fill positions.

b) Pregnancy tests are not a condition of employment and must not be demanded of employees.

c) Workers on maternity leave will not face dismissal or threat of dismissal, loss of seniority or deduction of wages, and are entitled to return to their jobs at their prior rate of pay and benefits. Employees who are affected by pregnancy may also be eligible to transfer to a less strenuous or hazardous position or duties provided certain prerequisites are met. Reasonable accommodations may be requested with the advice of the employee's health care provider. Lactation accommodation will be provided to nursing mothers upon request.

d) Workers will not be exposed to hazards, including glues and solvents that may endanger safety, including reproductive health.

e) Vendors performing work for Westcliff are required to provide appropriate services and accommodation to women workers in connection with pregnancy.

### ***Health and Safety***

Westcliff and vendors performing work for Westcliff are required to provide a safe, healthy working environment to avoid accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the work.

### ***Non-discrimination***

It is Westcliff policy that no one be subject to employment discrimination, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.

### ***Harassment and Abuse***

Every employee must be treated with dignity and respect. Employees must never be subject to physical, sexual, psychological or verbal harassment or abuse. Vendors performing work for Westcliff will not use or tolerate any form of harassment.

### ***Anti-Harassment/Discrimination/Retaliation***

University is committed to providing a work environment free of sexual or any form of unlawful harassment, discrimination or retaliation. Employees and contract workers are also protected by law from retaliation for opposing or reporting unlawful harassment or discrimination or for otherwise participating in processes connected with an investigation, proceeding or hearing conducted by University or a government agency with respect to such complaints. University will take disciplinary action up to and including the immediate termination of any employee who retaliates against another employee or contract worker for engaging in any of these protected activities. Contract workers will be subject to termination of their engagement with University for engaging in retaliation.

### ***Open Door and Grievance Policy***

To facilitate open communication and promptly resolve problems, employees are encouraged to bring work-related questions or concerns to management. Westcliff welcomes such discussions because they foster a productive and harmonious atmosphere. Employees must not be subject to adverse employment actions for raising good-faith concerns in a professional manner. Although any manager may be contacted to discuss a problem or concern, Westcliff recommends that employees try to resolve the situation first with an immediate supervisor, as that person is generally in the best position to evaluate the situation and provide an appropriate solution.

However, employees who are dissatisfied with the supervisor's decision or are uncomfortable discussing the issue with their supervisor, may contact the Human Resources Department. All grievances must be investigated promptly, fairly and thoroughly by impartial, qualified personnel. Complaints are designated confidential, to the extent possible. The complaint process is documented and tracked for progress and must be completed in a timely manner. Appropriate options for remedial actions and resolutions are considered. If at the end of the investigation misconduct is found, appropriate remedial measures are taken. To ensure grievances are properly addressed, employees are encouraged to submit complaints or concerns in writing. The above sentence is in the Disclaimer below.

### ***Child Labor and Forced Labor***

Westcliff and any approved Vendor working for Westcliff must not employ any person younger than 14. Vendors must agree to consult with governmental, human rights and non-governmental organizations, and to take reasonable steps as evaluated by Westcliff. In addition, the University is strongly opposed to forced labor, modern slavery and human trafficking, wherever they occur.

Updated: September 2025