



ANTI-HARASSMENT & EQUAL OPPORTUNITY POLICY STATEMENT

October 25, 2024

Policy Information

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Board-Level Approver:	Full Board (Compensation, Human Resources and Inclusion)
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Introduction

This FHLBank Policy, governed by the board of directors of the Federal Home Loan Bank of Topeka (FHLBank), establishes FHLBank's program for: (1) providing equal employment and contracting opportunities; (2) prohibiting discrimination on the basis of race (or traits historically associated with race, including but not limited to hair texture and protective hairstyles), color, creed, religion, sex, age, sexual orientation, national origin, ancestry, pregnancy, parental status, citizenship status, disability, genetic information, military or veteran status, gender identity and expression, or marital status; and (3) promoting the full realization of equal employment opportunity (EEO) and equal contracting opportunities through continuing outreach activities. It is further established to assist FHLBank in maintaining a work environment that is free from all forms of unlawful discrimination, abuse and other unlawful conduct, including harassment.

Purpose

FHLBank is committed to: (1) ensuring a work environment free from all forms of unlawful discrimination, abuse and other unlawful conduct, including harassment. In meeting its fiduciary obligation to its stockholders to prudently manage its financial and human resources, FHLBank expects all business partners to promote a work atmosphere in which business partners can feel productive, appreciated and respected; and (2) providing equal opportunities for all business partners, prospective business partners, contractors, and prospective contractors. To this end, FHLBank has designated the People, Culture and Development (PCD) department as responsible for performing the equal opportunity responsibilities pursuant to the Federal Housing Finance Agency's (FHFA's) Minority and Women Inclusion regulation and, with respect to employment matters, the CPIO as its EEO officer.

Scope

This Policy Statement is intended to impact all aspects of FHLBank's practices in the areas of employment, development, advancement and treatment of all FHLBank business partners, including in particular, hiring and disciplinary action; compensation, assignment, or classification of business partners; transfer, promotion, layoff, or recall; job advertising and recruitment; testing; use of company facilities; training and apprenticeship programs; fringe benefits; pay, retirement plans, and disability leave; and other terms and conditions of employment; and all aspects of FHLBank's contracting process. All business partners, directors, applicants, temporary employees, contractors, and consultants, with a special emphasis on managers, are responsible for ensuring compliance with this Policy Statement. For the purpose of references in this policy, "managers" are defined as business partners with direct reports.

Policy

FHLBank will not tolerate unlawful harassment or unlawful discrimination against its business partners, directors, vendors, members, clients, customers or visitors by managers, other business partners, directors, vendors, stockholders, clients, customers or visitors.

Unlawful harassment or unlawful discriminatory conduct consists of unwelcome conduct, whether verbal, physical, or visual, that is based upon a person's protected status, such as race (or traits historically associated with race, including but not limited to hair texture and protective hairstyles), color, creed, religion, sex, age, sexual orientation, national origin, ancestry, pregnancy, parental status, citizenship status, disability, genetic information, military or veteran status, gender identity and expression, or marital status. Such prohibited conduct includes abusive, demeaning or derogatory comments or other behaviors that show hostility or dislike of an individual because of their protected status or that of their relatives, friends, or associates. While the law represents the minimum acceptable standard, FHLBank does not tolerate any harassing or disruptive behavior and will take appropriate action in response to such behavior, which may include discipline up to and including termination. Business partners should also understand that conduct that violates this policy can occur in the workplace, which includes FHLBank facilities, work sites, vehicles, or while on work-related travel. However, it can also occur outside of the workplace and even outside of work hours, such as online via social media or at a social event. FHLBank undertakes no obligation to monitor the activities referenced.

In particular, sexual harassment may include unwelcome flirting or sexual advances, requests for sexual favors, unwanted physical contact, sexual jokes or references, displaying sexually suggestive material in the workplace and using offensive words or gestures of a sexual nature. No manager may threaten or insinuate, either explicitly or implicitly, that a business partner's refusal or willingness to submit to sexual advances will affect the business partner's terms or conditions of employment. Sexual harassment also includes a man harassing a man or a woman harassing a woman on the basis of that person's sex, sexual orientation, or gender identity or expression.

It is the effect on the work environment, not just intent, that is relevant in providing a harassment-free workplace. To that end, business partners must be aware that they are responsible for their comments and actions and should respect the wishes of others who do not share the same feelings or sense of humor.

In addition, this Policy Statement prohibits any type of unlawful harassment of FHLBank business partners or discriminatory conduct by third parties in the course and scope of employment. If a business partner believes they are being harassed at work by an individual who does not work at FHLBank, the business partner should report the conduct as described in this Policy Statement.

Through its philosophy of mutual respect, FHLBank underscores to business partners of all levels the seriousness with which it regards all forms of unlawful harassment, including but not limited to sexual harassment, both for the protection of business partners and all parties referenced above. By educating business partners about the issues, emphasizing the importance of mutual respect, and accentuating the need for individual responsibility, senior management hopes to enhance an already pleasant work environment in which business partners and FHLBank can best achieve their personal and collective goals.

This Policy Statement shall be distributed to all FHLBank business partners at least annually, and shall be posted in FHLBank's physical facilities, including through alternative media formats, as necessary, and shall be posted on FHLBank's website.

Any person who believes they have been discriminated against in violation of this Policy Statement should contact the CPIO in the manner described below. The CPIO is fully authorized to take whatever lawful, remedial or preventive measures necessary to ensure that both the letter and spirit of this Policy Statement are observed.

Reporting of Complaints and Concerns and Investigations

Business partners, directors, applicants, temporary employees, contractors, or potential contractors must report any action that may violate this Policy Statement and should complete and submit the Complaint Form (See Appendix A) or voice complaints or concerns regarding any action of which they are aware that may violate this Policy Statement. Such complaints or concerns shall be made directly to the CPIO or in the case of assertions of actions involving PCD, business partners shall contact the Legal department. Alternatively, a business partner may address a concern about an action towards themselves by telling an offending party that their behavior is unwelcome; however, if that statement of protest does not dissuade the offensive party from further prohibited conduct, they should immediately report the conduct as set forth above. Managers who witness or learn of actions that may violate this Policy Statement shall report the matter to the CPIO or the Legal department where appropriate.

After receiving any report, the CPIO, in conjunction with the Legal department, shall conduct a prompt and appropriate investigation, taking steps to ensure that the offending party is not prematurely notified of such, and take whatever remedial or preventive measures are necessary to ensure that both the letter and the spirit of the Policy Statement are enforced in a prompt, adequate and unbiased manner. Business partners must cooperate in any investigation.

FHLBank has a compelling interest in protecting the integrity of its investigations by protecting witnesses from harassment, intimidation, and retaliation; preventing evidence from being destroyed; and ensuring testimony is truthful. Sometimes, to achieve these objectives, FHLBank may decide it must keep the investigation in strict

confidence. If FHLBank reasonably imposes such a requirement, any business partner who fails to keep such confidentiality will be subject to disciplinary action, up to and including termination. A timely resolution of each complaint will be reached and communicated to the parties involved when possible while maintaining the confidentiality of personnel decisions.

Business partners, applicants, temporary employees, contractors, or potential contractors, and managers in particular, must report any action that may violate this Policy Statement of which they are aware to the CPIO with regard to contracting.

No Retaliation Permitted

Retaliation or reprisal against anyone for reporting unlawful discrimination or harassment, for telling the offending party that their conduct is unwelcome, or for cooperating with an investigation of a complaint of discrimination or harassment, is expressly and strictly prohibited. Reports of possible retaliatory behavior shall be made to the the CPIO or the Legal department, as appropriate, and will be appropriately investigated in a prompt, adequate and unbiased manner.

Exceptions/Violations

There are no exceptions to this Policy Statement.

Any violation of this Policy Statement may result in disciplinary action up to and including termination of employment.

Training

The CPIO shall conduct, or coordinate, annual training sessions for business partners regarding the requirements of this Policy Statement.

Limitation of Expressed Rights or Benefits

This Policy does not, and should not be construed to create, any right or benefit, substantive or procedural, enforceable at law, in equity, or through administrative proceeding, by any party against FHLBank or its directors, officers, business partners, agents, or any other person.

Policy Review

This Policy Statement shall be reviewed annually and revised as needed by the CPIO. Following such review, the Policy shall be submitted for review by the Executive Team and approval by the President. This Policy Statement shall be re-endorsed by the President and re-approved by the board of directors annually.

I hereby certify that the above is a true and correct copy of the Policy Statement approved by FHLBank's board on October 25, 2024.

Oct. 31, 2024

Date


Secretary to the Board

I hereby endorse the above Anti-Harassment & Equal Opportunity Policy Statement.

11/4/2024

Date


Jeffrey B. Kuzbel
President & CEO