# **Equal Employment Opportunity Policy for U.S. Based Employees**

## **April 2025**

## **POLICY SCOPE**

This policy is for US-based employees and applies to Verizon Communications Inc. and its subsidiaries ("Verizon"). This policy applies to all locations where employees work or represent Verizon, including the workplace, customer and vendor premises, and company-sponsored activities.

## **POLICY STATEMENT**

Verizon's policy is to provide equal employment opportunity ("EEO") to all persons without regard to race, color, religion, age, sex, medical condition, pregnancy, child birth or pregnancy-related conditions, sexual orientation, gender identity and expression, genetic information, national origin, disability, marital status, familial status, alienage, ancestry, citizenship status, veteran status, relationship or association with a protected veteran, military service member status, union activity or membership status, or any other legally protected classifications or activities. Verizon does not discriminate on the basis of any classification listed above, or other categories protected under federal, state or local law. Further, Verizon will recruit, hire, train, promote, administer personnel actions and make employment decisions without regard to such characteristics and based only on valid job requirements. Verizon also takes appropriate action to ensure equal opportunity for all applicants and employees and has established an audit and reporting system to allow for effective measurement of these activities.

## **Prohibition Against Harassment and Discrimination**

Verizon is committed to providing a work environment free from all forms of unlawful harassment and discrimination. Verizon has a zero tolerance policy with respect to conduct that has the purpose or effect of creating an intimidating, hostile or offensive work environment. Conduct does not need to be unlawful to constitute a violation of Verizon's policy against harassment and discrimination.

Harassment including verbal, physical or other behavior that denigrates or shows hostility or aversion toward an individual because of that person's protected characteristics (above) is prohibited to the full extent permitted by applicable law. Discrimination, meaning treating an individual less favorably with respect to a term, condition or privilege of employment because of a protected characteristic, is also prohibited to the full extent permitted by applicable law. Such harassment, and the discriminatory treatment of others based on their protected characteristics, is unacceptable regardless whether it is instigated by employees or non-employees, including contractors, interns, customers, vendors, suppliers and visitors. See Verizon's Anti-Harassment and Anti-Discrimination Policy for more information regarding Verizon's harassment and discrimination policy, including definitions, examples, and prohibited behaviors.



## **Reasonable Accommodations**

Verizon makes reasonable accommodations for the physical and/or mental impairments of employees or applicants if doing so will enable the employee or applicant to perform the essential functions of a position that the employee or applicant holds or is seeking, so long as the accommodation would not cause an undue hardship to the business. See <a href="Workplace">Workplace</a> <a href="Accommodations and Medical Restrictions">Accommodations and Medical Restrictions</a> for more information, including how to request a Workplace Accommodation.

Verizon also reasonably accommodates an employee's or an applicant's religious beliefs, practices and observances, unless doing so results in undue hardship to the Company. However, employees may not impose their religious beliefs on other employees, customers, business suppliers or other stakeholders. See <u>Religious Accommodation</u> for more information, including how to request a Religious Accommodation.

#### **Protection from Retaliation**

Employees and applicants for employment will not be subjected to retaliation (including harassment, intimidation, threats, coercion or discrimination) because they have engaged or may engage in (1) filing a complaint related to rights protected by, any Federal, State or local law requiring equal opportunity, including Section 503 and the equal opportunity provisions of VEVRAA; (2) opposing any act or practice made unlawful by, or exercising any other right protected by, any Federal, State or local law requiring equal opportunity; or (3) assisting or participating in any investigation, compliance evaluation, hearing, or any other activity related to the administration of any Federal, State or local law requiring equal opportunity. Retaliation includes any action by an employer or supervisor that punishes an individual upon learning of a harassment or discrimination claim, that seeks to discourage an individual from making a formal complaint or supporting a harassment or discrimination claim, or that punishes those who have come forward with such complaints. In addition to being prohibited by Verizon policy, such retaliation also may be unlawful. An employee who engages in retaliation in violation of Verizon's anti-retaliation policy will be subject to disciplinary action, up to and including termination of employment. See Verizon's Anti-Harassment and Anti-Discrimination policy for more information regarding prohibited retaliation, including definitions and examples.

## **Responsibility - Equal Employment Opportunity**

All employees are expected to adhere to Verizon's anti-harassment and anti-discrimination policy in their day-to-day working relationships and in carrying out their job responsibilities. It is the responsibility of employees to bring forward all complaints of discrimination and/or harassment consistent with the Complaint Procedure outlined below.

Supervisors and managers are responsible for ensuring compliance with this policy and for providing a work environment free from any form of discrimination or harassment. Management is also responsible for ensuring that all employees under their supervision are fully aware of this policy and appropriate complaint procedures. Supervisors and managers must notify Human Resources or Verizon Ethics whenever they become aware of any violation of this policy.



Human Resources is responsible for conducting or initiating an investigation, as appropriate, and recommending corrective action when warranted.

## Responsibility – EEO Compliance Program

The Associate Director of EEO Compliance & Reporting has overall responsibility for implementing and measuring the effectiveness of Verizon's EEO Compliance Program. Questions regarding the administration of this Program should be referred to the team at vz.hrcompliance@verizon.com. As required by applicable law, the Company's EEO Compliance Program for covered veterans and individuals with disabilities is available for review during regular business hours upon request to Human Resources or through Verizon Ethics at 844-894-8433 (US), ethics@verizon.com or online at <a href="http://www.verizonethics.com/">http://www.verizonethics.com/</a>. Any inquiries, contacts or documents received from the U.S. Department of Labor's Office of Federal Contract Compliance Programs ("OFCCP") must be immediately referred to the EEO Compliance & Reporting team at vz.hrcompliance@verizon.com.

## **Complaint Procedure**

An employee who believes they have been subjected to harassment or discrimination should immediately report their concerns. Employees who believe they have witnessed harassment or discrimination must immediately report their concerns. Employees may report concerns to their supervisor or manager (as appropriate), Human Resources, and/or Verizon Ethics at 844-894-8433 (US), ethics@verizon.com or online at <a href="http://www.verizonethics.com/">http://www.verizonethics.com/</a>. Employees who are subjected to or observe unlawful harassment and are comfortable doing so, should also confront the perceived harasser and ask that they stop.

Complaints will be treated in as confidential a manner as appropriate under the circumstances and information will be shared only on a need-to- know basis. All complaints will be properly investigated in a timely, thorough, and impartial manner by experienced personnel. Investigations may include interviews of the complainant(s), witnesses and respondent(s), and collection and review of documents and other relevant information. Complaints will be documented and tracked for reasonable progress. Interim actions may also be taken to prevent continuing conduct violations. Investigations will provide all parties with appropriate due process and will reach reasonable conclusions based on the evidence collected. Any acts of discrimination, harassment or retaliation in violation of this policy and/or violations of Verizon policy will be addressed and remedied in an appropriate manner, up to and including immediate termination of employment.

Supervisors who receive complaints regarding alleged misconduct or who become aware of situations involving potential harassment (including sexual harassment) or discrimination must immediately report the concerns to Human Resources or Verizon Ethics. Supervisors and managers who have knowledge of conduct that violates Company policy and fail to take the proper corrective action steps and report the conduct to Human Resources or Verizon Ethics, or who otherwise condone such conduct or permit it to continue, will themselves be subject to corrective action up to and including termination of employment.

For additional information regarding Verizon's Reporting and Investigations Process, please see https://vzweb.verizon.com/investigations.



Harassment or discrimination complaints received from an external governmental agency must be submitted to the EEO Compliance - External Investigations team within Human Resources immediately for proper handling and response.

Verizon's Chairman and CEO, Hans Vestberg, reaffirms support for this Equal Employment Opportunity policy and the Equal Employment Opportunity Compliance Program and delegates overall responsibility for the implementation of the equal employment opportunity activities as described herein.

#### Disclaimer Statement

This policy and its contents may be changed or eliminated without notice, at any time by the Verizon Company that employs you or any of its subsidiaries.

