



ANTI-HARASSMENT & EQUAL OPPORTUNITY POLICY STATEMENT

October 21, 2022

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 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

The 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 Human Resources and Inclusion (HRI) 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 CHRIO 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, contractors, and consultants are responsible for ensuring compliance with this Policy Statement.

Policy

FHLBank will not tolerate unlawful harassment or unlawful discrimination against its business partners by 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 status, gender identity and expression, or marital status. Such 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. In particular, sexual harassment may include unwelcome flirting or sexual advances, requests for sexual favors, displaying sexually suggestive material in the workplace and using offensive words or gestures of a sexual nature. Sexual harassment also includes a man harassing a man or a woman harassing a woman on the basis of that person's sex. 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 they, their corporate peers, and the legal community regard all forms of unlawful harassment, including but not limited to sexual harassment, both for the protection of business partners and stockholders. 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 CHRIO in the manner described below. The CHRIO 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, 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 should be made directly to the CHRIO or in the case of assertions of actions involving HRI, business partners may contact the Legal department. If the business partner prefers, they may report the action to their manager, who in turn must report such actions directly to the CHRIO or the Legal department, as applicable. 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. After receiving any report, the CHRIO, in conjunction with the Legal department, shall conduct an 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.

Business partners, applicants, temporary employees, contractors, or potential contractors must report any action that may violate this Policy Statement of which they are aware to the CHRIO 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 should be made to the business partner's manager or to the CHRIO and will be appropriately investigated.

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 CHRIO 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 CHRIO. Following such review, the Policy shall be submitted for review by the Executive Team and approval by the CEO. This Policy Statement shall be re-endorsed by the President and CEO 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 the FHLBank's board on October 21, 2022.

Oct. 28, 2022


Date


Secretary to the Board

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

11-01-2022

Date


Mark E. Yardley
President & CEO