

# **Norwest Non-Discrimination and Anti-Harassment Policy**

## *Our Commitment to Diversity and Inclusion*

Norwest Venture Partners (Norwest) is committed to maintaining a work environment in which everyone is empowered to develop, to contribute, and to succeed. As a Firm, we do not tolerate harassment or discrimination inside or outside of the organization. Creating an inclusive environment where employees, portfolio company executives, and individuals from our network with whom we collaborate feel comfortable, safe, and free from inappropriate and disrespectful conduct reflects the values that are at the core of who we are at Norwest.

Proactive initiatives that focus on action are necessary to shift the diversity, inclusion, and anti-harassment paradigm and help address sexual harassment in and around venture firms. We believe that decency is a non-negotiable core value in all business interactions including those between employees, investors, and entrepreneurs. Three key areas in which Norwest plays an active role include:

### **1. Training, Knowledge Transfer & HR Expertise**

Our firm requires that all Norwest managers and staff receive harassment prevention training upon hire and bi-annually. We ensure all employees read and sign-off on our anti-harassment policy annually, we hold an annual discussion of our firm values internally, and we educate all new hires and the portfolio companies in which we invest on our cultural values.

As a part of our portfolio services offering, we also collaborate closely with our portfolio company executives and provide them with sample policy materials and templates as well as compliance guidance and training options. This information is communicated to our companies as a part of the on-boarding process and annually across the portfolio.

We also have a full-time HR executive at Norwest with 20+ years of experience to manage our people function and advise our portfolio companies on their HR policies and practices. She provides a reporting channel to Norwest employees, and is also introduced to all portfolio companies as part of our portfolio services onboarding function. She is a key point of contact for our portfolio company executives.

### **2. Investor and Board-level Accountability**

Our investors are held accountable for reinforcing anti-harassment and inclusion best practices across portfolio companies. Partners who serve on boards are responsible for reviewing their portfolio companies' diversity and inclusion policies at the board level at least annually. This includes reviewing companies' anti-harassment and diversity policies, paths for reporting, issues that have been reported, and processes in place for training employees.

### 3. **Feedback Loops**

We have multiple feedback loops in place at Norwest in order to monitor diversity, inclusion and harassment questions/issues.

We survey all entrepreneurs who meet with Norwest investment teams and our partnership regarding their interactions with Norwest investors and our employees. This “Entrepreneur Experience Survey,” which was implemented in July 2016, provides an additional anonymous forum for communicating any adverse experiences with our firm.

Internally at Norwest, we conduct semi-annual surveys with our employees via Glint, an employee engagement survey platform. This enables us to take the pulse of our employee population, providing insights into our culture that may not be immediately obvious to the management of the Firm. We also conduct brand audits on our firm to uncover any “blind spots” in which we may not be aware, and we address these findings at the leadership level.

We also have a cross-functional culture committee established at Norwest to lead our diversity and inclusion efforts, which includes managing partners and executives to whom issues can be reported. Our VP of People Advisory, Laurie Tennant, is our main point of contact, and can be reached via email at [ltennant@nvp.com](mailto:ltennant@nvp.com)

#### **Our Policy:**

Norwest expects cooperation from all employees in making the non-discrimination and anti-harassment policies effective. The type of conduct prohibited by these policies is described below. Policy violations will result in appropriate disciplinary action, which may include termination of employment.

#### **Norwest Employee Rights and Responsibilities:**

You are entitled to timely resolution of any complaint about inappropriate behavior, and you are protected from retaliation for making a complaint or exercising other rights protected by law.

It is your responsibility to report harassing or inappropriate behavior, whether it is directed at you or it is something that you have seen or heard directed at someone else.

Any manager or supervisor who learns of inappropriate behavior, or receives a complaint about this kind of behavior, must immediately report the complaint to the Norwest Administrative Partner, VP of People, or any one of the Managing Partners. Norwest will investigate the situation and take timely and appropriate corrective action.

Every employee must cooperate fully during any fact-finding initiated by Norwest, providing honest and complete information.

## **Non-Discrimination**

We are committed to maintaining a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities in all aspects of employment and personnel matters (including, without limitation, recruiting and hiring, job assignment, compensation, opportunities for advancement (including promotion and transfers), evaluation, benefits, training, discipline, and termination), and prohibits discriminatory practices, including harassment. This policy applies to conduct by supervisors, co-workers, and third parties.

We expect that all relationships among persons in the workplace will be free of bias, prejudice and harassment. Therefore, it is the Firm's policy to ensure equal employment opportunity in all areas of employment without discrimination on the basis of race; color; religion or creed; sex or gender (including pregnancy, childbirth, breastfeeding or related medical conditions); age; physical or mental disability; medical condition; military or veteran status; national origin or ancestry; citizenship status; genetic information; marital and partnership status; sexual orientation; gender identity or expression; or any other characteristic protected by law. We also prohibit discrimination based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics.

## **What is Harassment?**

Norwest is committed to maintaining a workplace free from harassment based on any protected characteristic, including race; color; religion or creed; sex or gender (including pregnancy, childbirth, breastfeeding or related medical conditions); age; physical or mental disability; medical condition; military or veteran status; national origin or ancestry; citizenship status; genetic information; marital and partnership status; sexual orientation; and gender identity or expression.

"Harassment" is unwelcome conduct by any Norwest employee, visitor, portfolio company employee, or vendor, based on a protected characteristic, which directly or indirectly threatens or adversely affects a team member's:

- safety
- employment
- working conditions
- wages
- benefits
- other privileges of employment

Harassment can happen between members of opposite sexes or the same sex, and can be communicated in person, in writing, or by telephone, email or voicemail.

Prohibited harassment is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings, and business-related social events.

### **Examples of Harassment:**

Examples of prohibited behavior include, but are not limited to:

- Epithets, slurs, or derogatory comments
- Display or exchange of offensive jokes or pictures
- Intimidation
- Negative stereotyping
- Threats
- Assaults
- Written or graphic material that is insulting, or shows hostility or aversion towards an individual or groups because of their protected status
- Excessive or unwelcome physical contact, such as hugging, kissing, or massages
- Personal, social or romantic relationships, which could have – or may be perceived to have – an adverse impact on a team member’s performance
- Open discussions of intimate personal problems or activities
- Annoying conduct that interferes with a team member’s work performance or work environment, including actions or comments based on a person’s:
  - Race
  - Color
  - Religion or creed
  - Sex or gender (including pregnancy, childbirth, breastfeeding or related medical conditions)
  - Age
  - Physical or mental disability
  - Medical condition
  - Military or veteran status
  - Citizenship status
  - Genetic information
  - Marital and partnership status
  - Sexual orientation
  - Gender identity or expression
  - Any other characteristic protected by law

### **Sexual Harassment:**

“Sexual harassment” is conduct of a sexual nature—between members of the opposite or same sex—that is not welcome to the recipient. It includes advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when:

- Submission to this conduct is either explicitly or implicitly made a term or condition of an individual’s employment;
- Submission to or rejection of this conduct is used as the basis for employment decisions; or
- This conduct has the purpose or effect of unreasonably interfering with an individual’s work performance.

**Sexual harassment is illegal and absolutely not tolerated at Norwest.**

## **Examples of Sexual Harassment:**

Examples of sexual harassment include, but are not limited to, those listed below:

**Unwanted contact** – Sexual harassment can mean making unwanted contact of a sexual nature, whether the contact is:

- Written, including suggestive or obscene letters; electronic mail messages; notes and invitations.
- Verbal as communicated in person, by telephone or voicemail, including sexual advances or propositions; derogatory comments; slurs, jokes, or epithets of a sexual nature; comments about an individual's body or appearance; and sexually degrading words used to describe an individual;
- Physical, including assault; sexually suggestive touching or body contact; and impeding or blocking movement; or
- Visual, including sexual gestures; leering; and inappropriate display of sexually explicit objects, pictures, cartoons or posters.

**Coercive Behavior** – Sexual harassment can mean engaging in an implicit or explicit coercive sexual behavior which is used to control, influence or affect the career, salary or work environment of another team member.

**Conditional Benefits** – Sexual harassment can also mean offering employment benefits in exchange for sexual favors, including benefits such as:

- promotions;
- favorable performance evaluations;
- favorable assigned duties or shifts; or
- other benefits such as recommendations or reclassifications

## **Reporting Harassment:**

If you believe that you have been subjected to sexual harassment, other prohibited harassment, or discrimination, or have witnessed or otherwise become aware of such an incident, and if you are comfortable doing so, you should consider making it clear to the offender that such behavior is offensive. You are not, however, required to confront the offender.

In either instance, you should immediately report the incident to your manager, VP of People Laurie Tennant, Administrative Partner Kurt Betcher, or any one of the Managing Partners: Promod Haque; Jeff Crowe; or Jon Kossow. Individuals should not feel obligated to speak with or otherwise confront the offender before bringing the matter to the attention of one of the people named above.

For the Firm to be able to remedy alleged prohibited harassment, it is imperative that claims be brought promptly to the attention of Firm management. Failure to report claims of prohibited harassment hampers the Firm's ability to take necessary steps to remedy such situations. General partners, partners, vice presidents, directors, managers and supervisors must report all instances or complaints of discrimination and harassment of which they become aware—even if they did not personally experience or observe the discrimination or harassment.

A complaint of alleged sexual or other harassment or discrimination will be addressed promptly, impartially, and thoroughly by qualified personnel. Once a complaint is received, the Firm will be responsible for investigating the complaint as it considers appropriate. An investigation may include interviews with the complainant, the alleged offender, and any other persons the Firm deems appropriate. Relevant documents may also be reviewed. Employees are required to cooperate in all investigations. The Firm will endeavor to maintain confidentiality to the extent practicable, but confidentiality cannot be guaranteed.

**What to Expect** - Once you initiate a complaint by contacting one of the resources above, a representative of Norwest will obtain all relevant information from you and will make sure that the matter is investigated promptly and thoroughly. All team members are required to cooperate fully in any fact-finding initiated by the company. You will be contacted when the investigation is completed. Norwest will take the corrective action it determines is appropriate based on its findings.

**Retaliation** –Norwest will not tolerate retaliation against any team member who in good faith reports an incident of alleged harassment or inappropriate workplace behavior or provides information during an investigation, and we will take measures to protect team members from retaliation. Important: Retaliatory behavior is violation of this policy and is grounds for corrective action, which may include termination of employment.

**Further Assistance** – After reporting the results of the investigation and, if an individual remains unsatisfied after the investigation is complete, the individual may direct a written request for review to the Firm’s General Counsel, CFO, Administrative Partner or any member of the Firm’s management team, which may, if it deems appropriate in its reasonable discretion, direct or conduct an independent investigation concerning the complaint. Finally, you also have the right to seek assistance from the U.S. Equal Employment Opportunity Commission or your state human rights agency. These agencies are responsible for enforcing various laws prohibiting discrimination in employment, and they have complaint processes by which they investigate claims.

### **Portfolio Company Communication**

Something that is top of mind for our portfolio company executives is how to ensure a positive, respectful, and inclusive culture.

We’re extremely focused on this at Norwest, and we believe this is a value we share with our companies.

We’ve worked with several organizations and stakeholders to determine the best way to prepare our portfolio companies and provide them with the latest best practices in this area. We believe there are four key pillars that organizations should have in place in order foster a culture of inclusion. These recommendations, as well as sample policy templates and training options, are communicated to our companies as a part of the on-boarding process and annually across the portfolio:

1. Policy – a Formal Non-Discrimination and Anti-Harassment Policy
  - a. A clearly-stated zero-tolerance policy for harassment or inappropriate behavior.
  - b. Applies to all persons involved in the operations of the organization including founders, staff members, board members, clients, and vendors.
  - c. Should be reviewed and acknowledged by all employees annually.
2. Leadership
  - a. Leaders at the organization must set the tone and example in order to create a culture which will not tolerate harassment, no double –standards (actual or perceived).
  - b. Build a diverse workforce.
3. Anti-Harassment Training
  - a. Should be upon hire and at least bi-annual for everyone at the organization
  - b. Managers and supervisors in California have specific legal requirement for 2 hours of interactive training every 2 years. This is a good practice no matter where you are located, and we recommend training non-supervisory staff as well.
  - c. Consider supplementing with Unconscious Bias and Inclusion training.
4. Accountability
  - a. Reporting Process & Non-Retaliation - create a safe channel for harassment reporting and clear steps for investigating and protecting complainants.
  - b. Respond to all complaints. Investigations should be swift, fair, documented, thorough, and as confidential as possible.
  - c. Policies, reported issues (maintaining confidentiality), and training compliance should be a board agenda item at least annually.

**Who to Contact:**

If you need information about the harassment policy or complaint process, please contact one of these people:

- Laurie Tennant, VP of People: [ltennant@nvp.com](mailto:ltennant@nvp.com)
- Kurt Betcher, Administrative Partner
- Any one of the Managing Partners: Promod Haque; Jeff Crowe; or Jon Kossow.