



July 2026

Business Classification:

Copper State is a certified Women's Business Enterprise, certification # WBE1702190.



Culture, Respect, and Opportunity

1. **Introduction:** At Copper State, we are committed to maintaining a workplace built on respect, professionalism, equal opportunity, and inclusion. We believe that a workforce with varied backgrounds, experiences, perspectives, and ideas strengthens our organization, supports innovation, and improves problem-solving. We are dedicated to providing a work environment in which all employees are treated with dignity and respect and have the opportunity to contribute and succeed based on merit, qualifications, and performance.

2. Our Commitment:

- Promote a professional and inclusive workplace where all individuals are treated with dignity, courtesy, and respect.
- Provide equal employment opportunity in recruitment, hiring, training, compensation, promotion, transfer, discipline, and all other terms and conditions of employment.
- Make employment-related decisions based on legitimate business needs, qualifications, skills, experience, performance, and other job-related factors.
- Prohibit discrimination, harassment, retaliation, and other unlawful conduct in the workplace.
- Support compliance with applicable federal, state, and local employment laws and regulations.
- Foster a culture where employees are encouraged to raise concerns without fear of retaliation.

3. **Scope:** This policy applies to all employees, applicants, supervisors, managers, officers, temporary workers, and other individuals performing work on behalf of Copper State, as applicable.

4. Responsibilities:

- The Human Resources Department and Executive Team are responsible for overseeing, implementing, and monitoring Copper State's workplace inclusion and equal employment opportunity efforts.
- Managers and supervisors are responsible for applying employment practices consistently, fairly, and in accordance with this policy and applicable law.
- All employees are responsible for treating others with respect and helping maintain a workplace free from discrimination, harassment, and retaliation.

5. Key Initiatives and Practices:

- **Recruitment and Hiring:** Copper State will use fair, consistent, and job-related recruitment and hiring practices designed to identify qualified candidates and support equal employment opportunity.

- **Training and Education:** Copper State may provide periodic training and education to promote workplace respect, professionalism, anti-harassment awareness, and understanding of equal employment obligations.
- **Promotion and Advancement:** Opportunities for advancement will be based on legitimate, job-related considerations, including qualifications, demonstrated performance, skills, and business needs.
- **Compensation Practices:** Copper State may periodically review compensation practices to support fairness, consistency, and compliance with applicable law.
- **Workplace Accommodations:** Copper State will provide reasonable accommodations where required by law, including for qualified individuals with disabilities and sincerely held religious practices, unless doing so would create an undue hardship.
- **Inclusive Work Environment:** Copper State supports open communication, professional conduct, and a workplace culture in which employees are able to perform their work free from unlawful discrimination, harassment, and retaliation.
- **Supplier and Business Relationships:** Where appropriate, Copper State may encourage lawful and inclusive business practices in its external relationships, consistent with business needs and applicable requirements.

6. **Prohibited Conduct:** Copper State prohibits unlawful discrimination, harassment, and retaliation based on any characteristic protected by applicable law. This includes, but is not limited to, conduct related to race, color, religion, sex, pregnancy, sexual orientation, gender identity, national origin, age, disability, genetic information, or any other status protected by law. Copper State also prohibits retaliation against any individual who reports a concern in good faith, participates in an investigation, or otherwise exercises a protected right.

7. **Reporting and Investigations:** Employees are encouraged to promptly report concerns relating to discrimination, harassment, retaliation, or other inappropriate conduct through designated company reporting channels, including Human Resources, management, or any other established reporting mechanism. Copper State will review reported concerns promptly and, where appropriate, investigate them thoroughly and impartially. Confidentiality will be maintained to the extent practicable and consistent with a fair review.

8. **Corrective Action:** Violations of this policy may result in corrective action, up to and including disciplinary action or termination of employment, consistent with applicable law and company procedures.

9. **Compliance with Laws and Regulations:** Copper State will comply with all applicable federal, state, and local laws and regulations relating to equal employment opportunity, anti-discrimination, anti-harassment, anti-retaliation, and reasonable accommodation.

10. **Review and Amendment:** This policy will be periodically reviewed and may be revised, amended, or updated as needed to reflect changes in applicable law, regulatory guidance, business operations, and company practices.
11. **Communication:** Copper State will communicate this policy to employees and make it available through appropriate internal channels. The company may also make this policy publicly available, as appropriate.
12. **Conclusion:** Copper State is committed to maintaining a respectful, inclusive, and legally compliant workplace where employees are treated fairly and are able to contribute to the success of the organization. We will continue to support a culture of professionalism, accountability, and opportunity for all.