



July 2026

Unfair Discrimination and Harassment Policy

1. Policy Statement: Copper State is committed to maintaining a workplace free from all forms of discrimination, harassment, and retaliation. We value opportunity, respect, merit, and performance and strictly prohibit any form of unfair treatment toward employees, contractors, vendors, or other individuals associated with our operations.

2. Scope: This policy applies to all employees, applicants, contractors, subcontractors, vendors, suppliers, customers, and business partners engaged with Copper State across all locations and operations.

3. Definitions:

A. **Unfair Discrimination:** Unfair discrimination refers to unequal or adverse treatment of an individual based on protected characteristics, including but not limited to: age, race, color, ethnicity, national origin, religion, sex, gender, gender identity, sexual orientation, disability, pregnancy, genetic information, veteran status, or any other characteristic protected under applicable federal, state, or local laws.

B. **Harassment:** Harassment is any unwelcome conduct, verbal, non-verbal, physical, or digital that creates an intimidating, hostile, or offensive work environment or interferes with an individual's work performance. This includes conduct based on any protected characteristic.

C. **Sexual Harassment:** Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, including quid pro quo and hostile work environment scenarios.

4. Prohibited Conduct: Copper State strictly prohibits, but is not limited to, the following:

A. Discrimination:

- Hiring, promotion, or compensation decisions based on protected characteristics
- Unequal pay or benefits
- Limiting access to opportunities, training, or advancement
- Segregation or exclusion in the workplace
- Derogatory remarks, stereotypes, or bias-driven decisions

B. Harassment

- Offensive jokes, slurs, or comments
- Threatening or abusive behavior
- Displaying or distributing inappropriate or offensive materials (including digital content)
- Unwanted physical contact or gestures
- Sexual advances or coercion
- Bullying, cyberbullying, or repeated hostile conduct

5. Reporting and Complaint Procedure: Individuals who experience or witness discrimination or harassment are expected to report concerns promptly. Reports may be made to:

- A supervisor or manager
- Human Resources
- Designated reporting channels (including anonymous reporting where available)

All reports will be taken seriously and handled promptly, impartially, and confidentially to the extent possible. Investigations will be conducted in a timely manner, and appropriate corrective action will be taken when warranted.

6. Protection Against Retaliation: Retaliation against any individual who reports a concern, participates in an investigation, or supports a complaint is strictly prohibited. Any act of retaliation will be treated as a serious violation of this policy and subject to disciplinary action.

7. Consequences for Violations: Violations of this policy may result in disciplinary action up to and including termination of employment or business relationships. Legal action may also be pursued where applicable.

8. Training and Awareness: Copper State will provide regular, mandatory training to employees and leadership to ensure awareness, prevention, and compliance with this policy. Training will reflect current legal requirements and workplace best practices.

9. Review and Continuous Improvement: This policy will be reviewed periodically and updated as necessary to ensure compliance with evolving laws, regulations, and organizational standards.

10. Commitment: Copper State is committed to fostering a respectful, inclusive, and equitable workplace where all individuals are treated with dignity and professionalism.