pAI

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Policy Title: Equal Employment Opportunity (EEO) & Non-Discrimination Policy

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9. Purpose

This policy reaffirms pAI’s steadfast commitment to Equal Employment Opportunity (EEO) and the principle of non-discrimination. It ensures that all employment decisions are based on merit, qualifications, and business needs, fostering a diverse, inclusive, and respectful workplace free from any form of unlawful discrimination or harassment.

1. Scope

This policy applies to all pAI employment practices, including but not limited to, recruitment, hiring, promotions, transfers, compensation, benefits, training, social and recreational programs, layoffs, returns from layoff, termination, and all other terms and conditions of employment. It covers all employees (full-time, part-time, temporary), job applicants, contractors, and interns of pAI globally.

1. Definitions

| **Term** | **Definition** |
| --- | --- |
| **Discrimination** | Treating an individual or group less favorably than others based on a protected characteristic, rather than on their qualifications, performance, or business needs. |
| **Direct Discrimination** | Occurs when a person is treated less favorably than another person in a comparable situation because of a protected characteristic. |
| **Equal Employment Opportunity (EEO)** | The principle that all individuals should have equal access to employment and opportunities based on merit and qualifications, without regard to protected characteristics. |
| **Harassment (Non-Sexual)** | Unwelcome conduct that is based on a protected characteristic (e.g., race, religion) and that creates a hostile, intimidating, or offensive work environment. (For sexual harassment, see Policy HR-02). |
| **Indirect Discrimination** | Occurs when a policy, rule, or practice applies to everyone equally but has a disproportionate negative impact on individuals with a particular protected characteristic, and cannot be objectively justified. |
| **Protected Characteristics** | Attributes or categories legally protected from discrimination, which typically include: race, color, religion, national origin, age, sex (including pregnancy, childbirth, or related medical conditions), gender identity, sexual orientation, physical or mental disability, veteran status, genetic information, and any other characteristic protected by applicable local law. |
| **Reasonable Accommodation** | Any modification or adjustment to a job, work environment, or the way things are usually done that enables a qualified individual with a disability or religious belief to perform the essential functions of their job or enjoy equal employment opportunities, without causing undue hardship to the employer. |
| **Retaliation** | Any adverse employment action taken against an individual for asserting their rights under EEO laws, reporting discrimination in good faith, or participating in an investigation related to discrimination. |

1. Policy Statement

4.1 pAI is an Equal Employment Opportunity employer. All employment decisions will be made without regard to any protected characteristic, and solely based on qualifications, performance, skills, experience, and legitimate business requirements.

4.2 pAI strictly prohibits any form of discrimination or harassment (including verbal, physical, or visual) against job applicants or employees based on their protected characteristics. This includes, but is not limited to, discrimination in recruitment, hiring, promotion, compensation, benefits, training, discipline, and termination.

4.3 pAI is committed to providing reasonable accommodation to qualified individuals with disabilities and for sincerely held religious beliefs, where such accommodation does not impose an undue hardship on the company.

4.4 Retaliation against any individual who, in good faith, reports a concern about discrimination or harassment, participates in an investigation, or opposes discriminatory practices, is strictly prohibited and will result in disciplinary action.

4.5 All employees are expected to contribute to a workplace culture that embraces diversity, equity, and inclusion, treating all colleagues and external contacts with respect and dignity.

1. Procedures / Guidelines

5.1 Recruitment and Selection

5.1.1 All job postings shall clearly state that pAI is an Equal Employment Opportunity employer.

5.1.2 Recruitment efforts shall aim to attract a diverse pool of qualified candidates.

5.1.3 Interview questions and selection criteria shall be objective, job-related, and consistently applied to all candidates.

5.1.4 Decisions regarding hiring, promotions, and transfers shall be based on qualifications, merit, and business needs, without regard to protected characteristics (see Policy HR-05 for further details on Recruitment & Selection).

5.2 Training and Development

5.2.1 Access to training and development opportunities shall be provided equitably based on job requirements and career development goals, not on protected characteristics.

5.2.2 pAI shall provide regular training to employees and managers on EEO principles, non-discrimination, and preventing harassment, ensuring awareness of their rights and responsibilities under this policy.

5.3 Performance Management and Compensation

5.3.1 Performance evaluations and compensation decisions shall be based on objective criteria related to job performance, skills, and contributions, free from bias or discrimination related to protected characteristics.

5.4 Reasonable Accommodation

5.4.1 pAI will engage in an interactive process with qualified individuals with disabilities or those with sincerely held religious beliefs to identify and implement reasonable accommodations, unless doing so would cause undue hardship to the company.

5.4.2 Employees requiring reasonable accommodation should submit a written request to their Manager and the Human Resources department, outlining the nature of their need and any proposed accommodations.

5.4.3 The company reserves the right to request documentation from a healthcare provider or religious leader to support the request.

5.5 Reporting Discrimination or Harassment (Non-Sexual)

5.5.1 Any employee who believes they have experienced or witnessed discrimination or harassment (non-sexual) should report the incident immediately.

5.5.2 Reporting Channels:

\* Immediate supervisor or manager.

\* Any Human Resources representative.

\* Any member of Senior Leadership.

5.5.3 The complaint should include details such as the names of the individuals involved, dates, times, locations, a description of the conduct, and any witnesses.

5.5.4 All complaints will be investigated promptly, thoroughly, and impartially, maintaining confidentiality to the extent possible.

Table 1 – Examples of Prohibited Discriminatory Behaviors

| **Category** | **Prohibited Behavior Examples** |
| --- | --- |
| **Hiring/Promotion** | Refusing to hire a qualified candidate due to their age or national origin. Denying promotion opportunities to an employee due to their gender or disability. |
| **Compensation** | Paying an employee less than a colleague in a comparable role due to their race or sex, despite similar qualifications and performance. |
| **Work Assignments** | Assigning less desirable tasks or fewer opportunities to an employee based on their religious beliefs or sexual orientation. |
| **Termination** | Firing an employee because of their pregnancy status or a protected medical condition. |
| **Harassment** | Making derogatory comments about an individual's ethnicity, telling offensive jokes based on religion, or displaying racist materials. |
| **Retaliation** | Demoting an employee who reported a discrimination concern, or isolating them after they participated in an investigation. |

1. Responsibilities

| **Role** | **Obligation** |
| --- | --- |
| **All Employees** | Treat all colleagues and external contacts with respect and dignity. Refrain from any discriminatory or harassing behavior. Report any instances of discrimination or harassment they experience or witness. |
| **Managers / Supervisors** | Uphold and enforce this policy within their teams. Ensure all employment decisions are made without bias. Promptly address and report any complaints of discrimination or harassment to HR. Create and maintain an inclusive work environment. |
| **Human Resources** | Develop, implement, and periodically review this policy to ensure compliance with applicable laws. Provide training and guidance to employees and managers. Conduct investigations into all complaints of discrimination or harassment. Recommend and implement appropriate corrective actions. |
| **Senior Leadership** | Champion the principles of EEO and non-discrimination. Ensure adequate resources are allocated for policy implementation and training. Demonstrate visible commitment to diversity and inclusion. |

1. Compliance & Consequences

7.1 All individuals are required to comply with this Equal Employment Opportunity & Non-Discrimination Policy. Any employee found to have violated this policy will be subject to disciplinary action, up to and including termination of employment.

7.2 pAI will take prompt and effective corrective action to address any confirmed violations, which may include disciplinary measures, remedial training, and other actions designed to prevent recurrence.

7.3 Individuals who knowingly make false accusations of discrimination or harassment will also be subject to disciplinary action.

7.4 This policy does not limit an employee’s right to pursue remedies available under applicable anti-discrimination laws.

1. Review & Revision History

| **Version** | **Date** | **Description** | **Author** |
| --- | --- | --- | --- |
| 1.0 | 2025-07-01 | Initial release | HR Director |