



Anti-Harassment Policy and Procedures

DataMade commits to maintain a respectful, inclusive work environment for everyone, regardless of race, ethnicity, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender (including gender identity and gender expression), religion (including religious dress and grooming practices), religious creed, marital status, age, national origin, ancestry, citizenship, physical or mental disability, socioeconomic status or background, neuro(a)typicality, military and veteran status, genetic information, medical condition (including cancer and genetic characteristics), or sexual orientation.

Inappropriate workplace behavior and harassment, including at all events where an employee is representing DataMade, are wholly inconsistent with this commitment. No employee, contract worker, DataMade program participant, customer, vendor or other person who does business with DataMade is exempt from the prohibitions within this policy.

Prohibited Conduct

Harassment or discrimination includes any conduct based on the categories above if:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or engagement;
2. Submission to or rejection of such conduct by an individual is used as a basis for decisions concerning that individual's employment or engagement; or
3. It creates a hostile or offensive work environment.

DataMade does not tolerate harassment of or by its employees, contractors, and program participants in any form. Harassment includes offensive verbal comments, sexual images in public spaces, deliberate intimidation, stalking, photography or audio/video recording against reasonable consent, sustained disruption, inappropriate physical contact, and unwelcome sexual attention. Harassment does not need to be recognized as unwanted or unwelcome by anyone other than the person being harassed.

Treating any employee or individual differently or unfairly because of the characteristics listed above is also prohibited. Discrimination includes conduct that is 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. This policy applies to all terms

and conditions of employment and program participation, including, but not limited to, recruiting, hiring, training, promotion, discipline, compensation, benefits, and termination of employment.

Complaint Procedure

Employees, contract workers, or program participants who feel that they have been harassed or discriminated against, or who witness any harassment or discrimination by an employee, contract worker, program participant, customer, vendor, or anyone else who does business with DataMade, may immediately do the following:

1. If you feel comfortable enough to do so, tell the person engaging in the harassing and/or discriminating behavior that their actions are not welcome and that they must stop.
2. Report the incident verbally and/or in writing to a DataMade partner.
3. If you feel unable or uncomfortable reporting to a DataMade partner, contact the Ombudsperson using the contact information in the DataMade HR repository.

Any reported incident will be investigated by a DataMade partner and/or the Ombudsperson in a fair, impartial, timely, and thorough manner that provides all relevant parties with the opportunity to be heard and to present any information they think is relevant or important for consideration, and that allows DataMade to reach reasonable conclusions based on the information collected. The process will be initiated within 1 business day.

In responding to and taking action to address a complaint, DataMade will be as discreet as reasonably possible under the circumstances and will maintain confidentiality of the matter to the extent reasonably possible, subject to its obligation to conduct a full and fair investigation. Appropriate action will be taken by DataMade to stop and remedy any and all such conduct, including interim measures during a period of investigation. The investigation will be completed in a timely manner, after which DataMade will inform the writer of the complaint of the conclusions.

Partners will maintain confidential written records of all complaints and proceedings. If a report is made verbally, the partner will summarize it in writing and send it to the employee for approval.

Investigative Procedure for Complaints Made Against Partners

If the incident involves a partner, you may contact the Ombudsperson using the contact information in the DataMade HR repository.

The ombudsman will reach out to the partner who is the subject of the complaint within two (2) days and make the complaint known. The ombudsman will inform the subject

partner only in situations when the concerned party and/or parties give(s) them permission to do so.

The ombudsman will offer both parties the opportunity to talk about the problem in a setting that is mutually acceptable to both parties with the goal of admission of harms and agreement to atone.

If, over the course of multiple conversations, the concerned parties as well as the ombudsman feels that the individual has not been able to significantly change their behavior in response to legitimate concerns that fall under violations of this policy, the ombudsman should initiate a conversation with the other partners that will eventually include the individual, who may be subject to action, up to and including separation from the organization.

In the event of discharge, the individual will be given notice of their discharge, and will vacate their employee role at specified time.

To the maximum extent appropriate, harassment complaints made pursuant to this policy will be treated as confidential. DataMade prohibits any form of retaliation against an employee who makes a good faith complaint pursuant to this policy or who assists DataMade in the investigation of such a complaint.

Events

If any employee, contract worker, or program participant experiences harassment outside of the workplace at a professional event, they may take any or all of the steps outlined below:

1. If you feel comfortable enough to do so, tell the person engaging in the harassing and/or discriminating behavior that the actions are not welcome and that they must stop.
2. Where applicable, report the incident to the event's organizers.
3. Report the incident to a DataMade partner.
4. If you feel unable or uncomfortable reporting to a DataMade partner, contact the Ombudsperson using the contact information in the Datamade HR repository.

No DataMade employee will be expected to attend an industry conference that does not provide a code of conduct for attendees or state an anti-harassment policy. If these are absent, employees are encouraged to reach out to conference organizers and request that one be put in place.

DataMade employees are expected to uphold the company code of conduct at all professional events.

Retaliation Prohibited

DataMade will not allow retaliation against anyone who makes a complaint under this policy. DataMade will take disciplinary action up to and including immediate termination of any employee who retaliates against another employee, contract worker, or program participant for engaging in any of these protected activities. Contract workers and program participants will be subject to termination of their engagement with DataMade for engaging in retaliation.

Violations of Policy

Any employee, contract worker, or program participant who violates this policy will be subject to disciplinary action, up to and including termination of their employment or engagement. To the extent a customer, vendor, or other person with whom DataMade does business engages in harassment or discrimination, DataMade will take appropriate corrective action to address that situation.

Any employee, contract worker, or program participant who has questions about this policy or requires further information on the subject of sexual or other harassment or discrimination should contact one of the DataMade partners.

This policy is adapted from the Greylock Partners [Anti-Harassment Policy Template for Startups](#).

Acknowledgment

By signing below, I acknowledge that I have read and understand this policy.

Date: _____

Signed: _____

Printed Name: _____