

2026 Policy Evolution: Community Representation & Belonging

This policy was finalized in 2023, as a request from NHPR staff for organizational articulation of anti-racism efforts. In the past several years, NHPR has made strides in meeting many of these commitments. We've also recognized that true anti-racism requires moving beyond reactive measures toward proactive, structural policies and processes. We acknowledge that true representation is not a static metric, but an ongoing relationship with the communities we serve and the diverse, talented staff we employ. Our commitment to anti-racism, focused on equal opportunity, is inextricably linked to our operational infrastructure — ensuring that equity is embedded in our hiring, content sourcing, and internal decision-making processes. For an up-to-date summary of our current commitment, please visit [Community Representation and Belonging at NHPR](#).

NHPR Anti-Racism Policy, October 2023

This policy is intended to create organizational accountability around racism, anti-racism and DEI (diversity, equity, and inclusion) in the workplace and in our work; to create guidelines around what the organization will and won't tolerate; to clarify the reporting process for racist conduct; and to foster an anti-racist workplace that improves our workplace culture, makes it safer for Black people and people of color, and ensures the dignity of each member of our staff.

This anti-racism policy, instead of being focused on whether a protected class is targeted, is focused on racist behavior and the structures of racism themselves. It targets behavior against someone for their race or perceived racial background, and behavior, language, and actions that are racist in nature. This policy reflects NHPR's commitment to fostering an environment that prohibits and addresses racist structures, behavior and conduct. NHPR will address and dismantle racism in a variety of ways, including those listed here.

Finally, we recognize that the organizational commitment to preventing racist behavior is an on-going process that does not end with putting a policy in place. We outline below the procedures for reporting and enforcement.

This is a living document that may be updated or amended over time. It is intended to be effective and compassionate. Please help us fulfill this part of our promise by contacting Human Resources with your questions, comments, and concerns.

What are Racism and Anti-racism?

Unlike "harassment" or "discrimination," there is no legal definition of racism or anti-racism -- the definitions in this policy instead reflect our own internal standards at NHPR. Our overall

goal with these definitions is to ensure that our workplace models respect, civility and common decency, and that employees understand this policy.

We acknowledge that racism can be unconscious, implicit or unintentional, and that identifying racism as an issue does not automatically mean those involved in an act of racism are racist or that they intended to have a negative impact. As an anti-racist organization we purposefully identify, discuss and challenge issues of equity, diversity, inclusion and racism and the effects they have on employees, the organization, internal and external stakeholders (including donors, underwriters and sources), and the greater community.

Racist conduct is often compounded by other forms of discrimination (for example, discrimination based on sex or disability), and this policy acknowledges the importance of taking the intersectionality of racism and other forms of discrimination and bias into account in programs aimed at eliminating racial discrimination, harassment and/or vilification.

Our definition is set out below; use it to guide your understanding of what is considered racist behavior and what is not, as well as what it means to be anti-racist.

Racism:

Racism is a system of privilege, inequality, and oppression based on perceived categorical differences, value assigned to those differences, and rewards and punishments based on the assigned differences. Racism involves one group having the power to carry out systematic discrimination through the institutional policies and practices of the society and by shaping the cultural beliefs and values that support those racist policies and practices.

Racism is further defined as follows:

- Racism is the unequal treatment or vilification, passive or active, intentional or not, based on the color of someone's skin or perceived racial origin.
- It may be verbal, non-verbal, written or physical, and it may overlap with Protected Class harassment or discrimination.
- Racism can include victimizing, rudely embarrassing, intimidating or threatening a person, regardless of intent and regardless of the seniority of the people involved.
- Racist behavior includes epithets, slurs, microaggressions (defined as comments or actions that subtly and often unconsciously or unintentionally express a prejudiced attitude toward a member of a marginalized group), jokes, pranks or other forms of negative stereotyping, as well as threatening, intimidating or hostile acts directed at or concerning any individual or group of people, present or not, or that of the individual's relatives, friends or associates, based on that individual's or group's race. It also includes display or circulation of written, graphic or recorded material that denigrates or shows hostility or aversion based on someone's actual or assumed race, such as

derogatory posters, cartoons, drawings, e-mail, computer screen backgrounds, audio recordings, videos, graffiti or photographs.

Racism is not:

- Personality conflicts.
- Voicing opinions or views about the workplace.
- Differences in approaching work or interacting with others (e.g. preferences for fast-paced group brainstorming versus individual work in solitary spaces).
- Disciplinary measures conducted in accordance with our policies.

Anti-Racism:

In our workplace, anti-racism is the work of actively opposing racism with our actions and words. Anti-racism involves consistently identifying racist behavior and the structures of racism, and then addressing and dismantling them. It is the commitment to fighting and opposing racism wherever and whenever it is found.

Our Commitments

We will take people seriously.

We value listening deeply, with empathy, to each other; supporting each other; and being accountable to each other. NHPR employees in management or Human Resources roles have a special responsibility to ensure that people reporting an incident are taken seriously and offered support. We provide multiple options for making reports, as outlined in this policy. But regardless of how an incident is reported, our first responsibility is to listen fully, and with compassion.

We will work to resolve issues about how people are treated in the workplace whether or not there is a violation of official company policy.

Our second responsibility is to work in good faith to find a solution. Not every report or concern shared with a manager or Human Resources will be a policy violation. However, each concern reflects a problem that is affecting at least one employee and may have an impact on that person's experience at NHPR. We will look for solutions that make sense for each situation. We will follow up on complaints in a timely manner and ensure communication with the employees involved.

We will not permit retaliation against employees for bringing forward an issue.

A prohibition against retaliation is a key component of this policy, and any violations of the non-retaliation policy (as outlined in NHPR's handbook) cut to the core of our ability to build trust in the process and to keep our employees safe from harm.

We will give our managers the tools they need to create a successful working environment in their department.

We will provide manager training to build skills and provide tools to help managers keep their teams working effectively and well together. Managers at NHPR are critically important to making sure teams are functioning well and to creating an environment that opposes racism.

We will strive to provide clarity in our company policies and in the processes related to those policies.

If we expect compliance with company policies, we recognize the need to provide as much clarity as possible as to what those policies are, how to go about reporting violations and how those violations will be handled. That commitment begins with the explanations and descriptions in this document. It continues with training, one-on-one discussions, listening to feedback and concerns about the policies and processes themselves and revisions over time where appropriate.

We will speak up in situations where racism occurs.

We will encourage and provide support for staff to constructively point out incidents of racist behavior or language in the moment. Support may include training, the development of a shared language and the encouragement of trust among colleagues.

Our Responsibilities

This policy prohibiting racist behavior applies to every person in our workplace, including employees (including temps and hourly workers), interns, trustees, volunteers, vendors and contractors or other third parties. It prohibits each of these people from engaging in racist conduct.

Conduct prohibited by this policy is unacceptable in the workplace, offline and online, and in any off-site work-related setting, such as during business trips, business meetings or

business-related social events. **Prohibited conduct includes conduct in any work-related setting that is targeted at people who are not employees**, such as, but not limited to, guests, visitors, interns, underwriters, donors, volunteers, contractors, vendors, trustees or other third parties.

It is everyone's responsibility to notice and learn how our own actions may affect others.

Responding to Incidents of Inappropriate Behavior

If you feel you or one or more of your colleagues have been subjected to racist conduct - or if you witness or are told (either directly or indirectly) about this kind of conduct or behavior - we urge you to speak up in the moment, or report your concerns as soon as possible. This applies to both people who are directly the target of racist conduct and to bystanders. It also applies regardless of the offender's identity or position, even if they are not an employee. While we know it can be extremely difficult to come forward, no action can be taken unless managers or Human Resources are informed about the issue.

There are multiple avenues you can take to report a racist behavior or incident, depending on what feels most comfortable for you. You can inform:

- anyone in Human Resources.
- your direct manager.
- another manager or department head or the CEO.

If you have exhausted these internal options and believe that an incident, or a policy, practice or activity is in violation of the law or this policy, you can bring concerns, complaints or questions to the NHPR Board of Directors using the process outlined in the Whistleblower Policy.

Special Responsibilities of Managers and Human Resources

Managers and Human Resources have a special responsibility as representatives of the organization to ensure that employees feel safe and to create an environment conducive to productivity and professional development. It is the responsibility of all managers to work with Human Resources in reporting and responsibly handling complaints or reports of racist behavior or incidents of racism.

Throughout the process, Human Resources and individuals' direct managers are committed to and responsible for offering support to the employee making a report as well as any others involved in an incident or an investigation. This support may take different forms depending on the employee's needs.

Human Resources has multiple responsibilities and takes a lead role in ensuring NHPR is meeting its commitments to anti-racism as outlined in this document. Human Resources staff are charged with hearing employee complaints and concerns and acting on them swiftly. It is also their job to ensure that managers have the knowledge and tools to support their teams and help prevent issues and incidents from arising, and to properly address issues and incidents if they do arise.

Any manager made aware of a complaint, concern or other information relevant to an incident, policy or practice involving racism must get in touch with Human Resources immediately. If managers personally observe misconduct, they can take action directly—warning the employee that the conduct is inappropriate—but must also notify Human Resources as soon as possible. This applies to incidents involving full-time and part-time staff, interns, guests, visitors, volunteers, contractors, underwriters, donors, vendors, trustees or other third parties.

Human Resources will work with the manager making the report to determine next steps based on the nature of the incident, following the process for handling reports outlined in this policy.

It is critical that managers take all reports and concerns seriously and act promptly. Managers must also take action to prevent any retaliation and to prevent misconduct from recurring. The Human Resources team will work with managers to help make sure this happens.

Managers who knowingly tolerate racist behaviors, or incidents, policies or practices that involve racism, including by not immediately consulting with or notifying Human Resources, are in violation of this policy.

What Happens When a Report is Made

We have described below what happens when a report is made. Every situation is different, and not every aspect of this process will apply to all situations. For example, different people may be involved in handling an investigation if there are conflicts of interests or similar concerns.

Confirmation and initial conversations

- Once a report has been received by Human Resources (either directly, or through one of the avenues listed above), a confirming email will go out to the person making the report (if possible) noting this. Then, someone from Human Resources will meet with the affected employee or the person making the report (as appropriate) to talk about the report.

Determination as to whether to conduct an investigation

- Human Resources will review the report and determine whether an investigation will be conducted or the report may be resolved through other means. Legal counsel may be sought depending on the situation.
- An investigation is a formal process with the goal of gathering the necessary information to make an appropriate and responsible decision about what to do in a particular circumstance.
- If no investigation is conducted initially, Human Resources will work with the managers on recommending appropriate action. For example, coaching and/or cultural competence training may be an appropriate step in a case in which someone unintentionally makes a racially insensitive comment. There is always the option of conducting an investigation at a later stage if this more informal step is unsuccessful or if additional concerns come up at a later point.

Conclusion and Follow-up

The specific corrective action will take into account the following factors (and may consider other factors):

- the severity and pervasiveness of the conduct.
- prior reports about the employee whose behavior is at issue.
- the information that the team is able to gather.

Some of the specific corrective or disciplinary actions that may be recommended are:

- targeted training about workplace behavior.
- counseling referral and attendance.
- a reduction or change in job responsibilities.
- revision of policies or practices.
- suspension or termination. In the case of any third parties (e.g., vendors, contractors, guests) who violate this policy, their services or appearances may be cancelled.

Regardless of whether an investigation is conducted, Human Resources will follow-up with the affected person or the person making the report (as appropriate) to determine their satisfaction with how the matter has been handled, to see how they are doing and to assess whether further intervention is appropriate.

On a regular schedule, Human Resources will update the staff on actions taken under this policy. These updates, while respecting the privacy of individuals involved, will describe incidents and responses, with the intention of increasing the staff's understanding of what the organization will or won't tolerate.