



Equal Opportunity Policy

Effective Date: September 1, 2023



Equal Opportunity Policy

Document Title:	Equal Opportunity Policy
Document Owner:	Diversity, Equity and Inclusion Office
Document Type:	Policy
Regulatory Review Performed by:	Jessica Sporleder on 7/31/2023
Bank Level Approver:	Executive Team
Board Level Approver:	None
Last Approval Date:	August 2023
Next Review Date:	August 2024
Law/Regulatory Citation:	Title VII of the Civil Rights Act of 1964 Equal Pay Act of 1963 Age Discrimination in Employment Act of 1967
Associated Governing Document(s):	Reasonable Accommodation Procedure Diversity, Equity & Inclusion Policy Diversity, Equity and Inclusion Statement Complaint Handling and Whistleblower Policy Employee Handbook
Enterprise Governing Document:	Yes



Equal Opportunity Policy

Table of Contents

I. Purpose and Scope	4
II. Roles and Responsibilities	4
III. Harassment Free Environment.....	5
IV. Complaint Procedure	5
V. Retaliation Prohibited.....	6
VI. Liability for Harassment, Discrimination or Retaliation.....	6
VII. Communications	6



Equal Opportunity Policy

I. Purpose and Scope

In the Federal Home Loan Bank of Des Moines, we are committed to promoting diversity, equity and inclusion among our employees and directors; and in all financial transactions and activities, including those in service to our members, broker dealers and suppliers.

In keeping with this commitment, the Bank has established policies and practices to support and promote the concept of equal opportunity. These policies and procedures extend to all aspects and actions related to employment including recruiting, hiring, placement, training, promotion, evaluation, termination, reductions in force, transfers, compensation, leaves of absence, reasonable accommodations, benefits, social and recreational programs and working conditions. This Policy also applies to our contracting policies and practices, which involves the Bank’s relationships with suppliers and contractors. All employees, contractors and consultants will operate in accordance to this Policy and comply with all applicable federal, state and municipal laws and regulations.

The Bank prohibits discrimination on the basis of race, color, religion, sex (including pregnancy, sexual orientation or gender identity), national origin, age, disability, veteran status, genetic information (including family medical history), status as a parent or any other characteristic protected by applicable law. These policies and practices have been put in place to protect all employees, applicants for employment, contractors and suppliers.

The Bank has designated both the Diversity, Equity and Inclusion Office (DEI)¹ and Human Resources function responsible for ensuring compliance with this Policy.

II. Roles and Responsibilities

Relevant Party	Roles and Responsibilities
DEI Office	<ul style="list-style-type: none"> • Oversight of the Equal Opportunity Policy and program • Ensure the Equal Opportunity Statement is on display in the Bank’s offices and on the external and internal websites • Respond to any external party that reports discriminatory, harassing or inappropriate conduct and retain documentation for the same time frame as complaints, which is detailed in the Complaint Handling and Whistleblower Policy
Human Resources	<ul style="list-style-type: none"> • Oversight of the Equal Opportunity Policy and program • Promote the concept of equal opportunity in all actions related to employment

¹ The Bank’s OMWI Office is referred to as our Diversity, Equity and Inclusion Office.



Equal Opportunity Policy

	<ul style="list-style-type: none">Respond to any employee that reports discriminatory, harassing or inappropriate conduct and retain documentation per record retention guidelines detailed in the Complaint Handling and Whistleblower Policy
Enterprise Procurement and Vendor Management	<ul style="list-style-type: none">Promote the concept of equal opportunity in contracting policies, procedures and practices
Treasury	<ul style="list-style-type: none">Promotes the concept of equal opportunity through financial transactions, education and outreach
Managers and Leaders	<ul style="list-style-type: none">Ensure that their area of responsibility is free from harassment and inappropriate or discriminatory conduct
All employees	<ul style="list-style-type: none">Report any harassment, inappropriate or discriminatory conduct to Human ResourcesFollow complaint submission guidelines detailed in the Complaint Handling and Whistleblower Policy, if necessary
External Parties	<ul style="list-style-type: none">Report any harassment, inappropriate or discriminatory conduct to Chief DEI Officer as directed in the Equal Opportunity Statement on the Bank's external website

III. Harassment Free Environment

All managers and leaders are responsible for ensuring that the workplace and their areas of responsibility are free of conduct that is harassing, discriminatory or inappropriate and for enforcing this policy at all times with respect to all employees. Any employee who observes discriminatory, harassing, inappropriate conduct or receives a complaint about such conduct must promptly report the conduct to Human Resources or to the Chief DEI Officer if it involves external parties.

The Bank strives to keep our workplace and all activities free from all forms of harassment. Some examples of conduct that might be considered harassment include:

- Ethnic slurs
- Derogatory or offensive remarks, jokes or innuendos
- Sexually explicit material such as pictures or email
- Unwelcome physical contact
- Verbal or physical conduct that has the purpose or effect of creating an intimidating, hostile or offensive work environment

The Bank considers harassment in any form to be a serious offense and a violation of the Bank's Equal Opportunity Policy. All harassment is unlawful and will not be tolerated.

IV. Complaint Procedure



Equal Opportunity Policy

The Bank's complaint procedure provides for an immediate, thorough and objective investigation of any claim of harassment or discrimination. Appropriate disciplinary action will be taken against any employee found to have engaged in harassment or discrimination.

Employees and Applicants

Consistent with the Bank's Employee Handbook, Diversity, Equity and Inclusion Policy and Complaint Handling and Whistleblower Policy, any employee or applicant who believes they have been harassed, discriminated against or retaliated against on the job, or is aware of such conduct toward others, should follow the complaint submission guidelines detailed in the [Complaint Handling and Whistleblower Policy](#) to communicate the complaint.

Other External Parties

A contractor, broker dealer or supplier who believes that they or their company has been harassed, discriminated against or retaliated against in any aspect of the contracting process or administration of contracts or is aware of such conduct toward others should report the incident to the Chief DEI Officer as directed in the Equal Opportunity Statement on the Bank's external website. A written complaint can be sent to DiversityOffice@fhlbdm.com.

V. Retaliation Prohibited

The Bank prohibits retaliation against any employee, applicant, contractor, broker dealer or supplier for reporting a claim of harassment or discrimination or for participating in any investigation into allegations of possible illegal discrimination or harassment.

The procedure detailed above for complaints of harassment and/or discrimination also applies to complaints of retaliation.

VI. Liability for Harassment, Discrimination or Retaliation

Any employee of the Bank who is found to have engaged in harassment, discrimination or retaliation is subject to disciplinary action, up to and including termination of employment. Any applicant, contractor, broker dealer or supplier who is found to have engaged in harassment, discrimination or retaliatory behavior may be subject to immediate termination of consideration or engagement of services.

Appropriate action will also be taken to deter any future harassment, discrimination and/or retaliation.

VII. Communications

Federal and state government nondiscrimination posters and the Bank's Equal Opportunity Statement is displayed permanently in the Bank's offices, including through alternative media formats as necessary, and shall be posted on the Bank's intranet and external sites. This Policy shall be reviewed at least annually.