



Pension Benefit Guaranty Corporation
445 12th Street SW, Washington, DC 20024-2101

Office of the Director

March 9, 2026

TO: All PBGC Staff

FROM: Janet Dhillon, Director

SUBJECT: Equal Employment Opportunity (EEO) and Anti-Harassment Policy Statement

Pension Benefit Guaranty Corporation (PBGC) is committed to equal employment opportunity (EEO) and to maintaining a workplace free from discrimination, harassment, and retaliation. This policy establishes the standards and requirements for ensuring a respectful working environment consistent with Federal law and assures that all employees and applicants have the freedom to compete on a fair and level playing field. PBGC affirms that every employee and applicant must be treated with civility and respect. In accordance with Federal law - including Title VII of the Civil Rights Act of 1964; The Age Discrimination in Employment Act of 1967; The Equal Pay Act of 1963; The Rehabilitation Act of 1973; The Pregnancy Discrimination Act of 1978; The Pregnant Workers Fairness Act; and The Genetic Information Nondiscrimination Act of 2008 - the Corporation prohibits discrimination on the basis of all protected characteristics. These protections apply to all personnel actions and employment programs, including recruitment, hiring, details, reassignments, training, performance evaluation, promotions, awards, benefits, discipline and separations. PBGC prohibits discrimination and harassment based on race, color, religion, sex, national origin, age (40 or older), disability, genetic information, and pregnancy, childbirth, or other related medical conditions. This policy also protects against discrimination or harassment based on marital status and parental status. All employees share the responsibility for upholding these principles. PBGC provides reasonable accommodations to employees and applicants with disabilities and for sincerely held religious beliefs, observances, and practices.

Harassment of any kind is prohibited. PBGC's goal is to stop unwelcome conduct before it rises to the level of unlawful harassment, or before it becomes severe or pervasive. Employees are encouraged to report inappropriate or unwelcome conduct promptly so the agency can take immediate and appropriate corrective action. Harassment is defined as unwelcome conduct based on a protected characteristic that a reasonable person would find hostile, intimidating, or abusive, or that interferes with an individual's work performance. Harassment may be verbal, physical, written, visual, online, or non-verbal, and it may be committed by supervisors, coworkers, subordinates, or non-employees such as contractors. Examples of harassing conduct includes offensive remarks, jokes, slurs, physical interference, unwanted touching, inappropriate images or messages, or conduct that disrupts the workplace. Conduct becomes unlawful when submission to the conduct is made a condition of employment, when employment decisions are influenced by such conduct, when the conduct is severe or pervasive enough to alter the conditions of employment, or when it creates a hostile work environment.



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PBGC will conduct prompt, thorough, and impartial investigations of allegations of harassment. Investigations will begin within 10 calendar days of the agency receiving notice of the alleged conduct and all employees are expected to cooperate fully with the investigative process.

Retaliation is prohibited and is defined as taking adverse action against an employee or applicant because they engaged in protected activity. No employee may be subjected to reprisal for reporting discrimination or harassment, participating in an EEO or internal investigation, asserting whistleblower rights, opposing unlawful practices, or exercising any protected right. Retaliation may include adverse actions, threats, intimidation, or subtle changes in workplace treatment and it violates Federal law and Corporation policy.

To the extent possible, PBGC will protect the confidentiality of individuals who report discrimination, harassment, or retaliation. Information will be shared only with those officials who have a legitimate need to know in order to address the matter or conduct an investigation.

All employees are responsible for demonstrating professional conduct, supporting a respectful workplace, and cooperating with the enforcement of this policy. Individuals who engage in behavior that violates this policy may be subject to appropriate disciplinary action up to, and including, removal from Federal service.

Employees or applicants who believe they have been subjected to discrimination, harassment, or retaliation should contact the Office of Equal Employment Opportunity (OEEEO) at (202) 229-4363 or email eeo@pbgc.gov. Individuals who choose to initiate the EEO complaint process must do so within 45 calendar days of the incident they believed to be discriminatory, or the date they became aware of the incident. Where an aggrieved individual elects, and OEEEO determines that Alternative Dispute Resolution (ADR) is appropriate, managers and supervisors have a duty to participate in the ADR process.

PBGC employees who believe they have been harassed or have been subjected to a hostile work environment should report the matter immediately to their immediate supervisor, another management official, the Office of Equal Employment Opportunity by calling (202) 229-4363 or email at eeo@pbgc.gov, or PBGC's Harassment Inquiry Committee (HIC).

HIC Intake Points of Contact:

- Jaime Kunce (OGC) – (202) 229-3463
- Kimberlee Gee (OGC)- (202) 229-4768
- Arrie Etheridge (HRD) – (202) 229-3728
- Wendy Lawrence (HRD) – (202) 229-3142

An employee who reports allegations of harassment or hostile work environment, whether to the HIC, a PBGC supervisor/manager, or the Human Resources Department (HRD), has ***not*** filed an EEO complaint. The federal sector EEO discrimination complaint process ***cannot*** be



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initiated by reporting harassment or hostile work environment to a supervisor or management official, HRD, or by contacting the Employee Assistance Program (EAP), or union.

This policy applies to all PBGC employees. Questions or requests for additional information should be directed to the Acting OEEEO Director at (202) 229-3345 or Fuller.Hope@pbgc.gov.