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# **Non-Discrimination and Anti-Harassment Policy**

Policy No. GL-HR-12005

## **Category**

Human Resources

## **Policy Owner**

Mary Steed  
Chief People Officer

## **Adopted**

September 2023

## **Revised and/or Approved**

Approved

## **Review Frequency**

Annually

## **Related Policies**

Code of Business Ethics and Conduct

## **Country/Countries**

Global

## **Classification**

Unclassified Public

## **Attestation Notation:**

N/A

## **Additional Notes:**

N/A

## **Non- Discrimination and Anti-Harassment Policy**

The Company is committed to maintaining a working environment free from discrimination and harassment, whether based on race, color, religion, sex, sexual orientation, gender identity, age, national origin, disability, genetic predisposition or carrier status, or any other characteristic protected by law.

It is a violation of law, and expressly against Company policy, for any employee, or other person over whom the Company has control, to engage in any conduct that denigrates or shows hostility or aversion toward an individual because of her or his race, color, religion, sex, sexual orientation, gender identity, age, national origin, disability, genetic predisposition or carrier status, or any other characteristic protected by law, and that (i) has the purpose or effect of creating a hostile working environment, (ii) has the purpose or effect of unreasonably interfering with an individual's work performance or (iii) otherwise adversely affects an individual's employment opportunities or working relationship with the Company. This policy applies to all discrimination and harassment (sexual or non-sexual) occurring in the work environment, whether on Company premises or in client or other work-related settings, and applies regardless of the protected class of the individuals involved. The Company has zero tolerance for harassment and discrimination, will investigate all reports thoroughly and objectively, and take prompt remedial action.

This policy covers all employees of the Company, including applicants for employment and third parties over whom the Company has control. For example, it covers unlawful discriminatory harassment by non-employees (e.g., consultants, contractors, and vendors) to the extent that the Company has control over such individuals and their conduct affects the work environment or unreasonably interferes with the performance of work as described below.

### **Sexual Harassment Specifically**

The Company prohibits all forms of sexual harassment, including, but not limited to, unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when it may reasonably be perceived that:

- Submission to such conduct either is explicitly or implicitly a term or condition of employment
- Submission to or rejection of such conduct is used as a basis for employment decisions, including, but not limited to, discharge or performance evaluation
- Such conduct has the purpose or effect of materially and adversely interfering with an individual's ability to perform a job by creating an intimidating, hostile, humiliating, or sexually offensive working environment

Examples of improper conduct may include, but are not limited to: unwelcome sexual advances, sexual remarks or jokes, inappropriate touching, gesturing, or physical interference which impedes or blocks another's movement, or demeaning posters, cartoons, photographs, graffiti, or drawings. In general, conduct of a sexual nature that materially and adversely interferes with an individual's work performance constitutes sexual harassment.

## Training

All employees and contractors are expected to successfully complete assigned training on discrimination and harassment in the workplace, including compliance with any state and local law training requirements based on their geographic area.

## Reporting and Investigation

It is the responsibility of every employee and supervisor to further the implementation of the Company's policies forbidding discrimination, harassment, and sexual harassment, and to ensure compliance within each department.

If at any time any employee believes that they are being discriminated against, harassed, or sexually harassed in any way, or believes that they have witnessed any form of discriminatory conduct in the workplace, the employee is required to report the incident(s) to their supervisor. If this is not possible for any reason, or the employee is uncomfortable reporting the conduct to their supervisor, the employee may report the incident(s) to the department head, local human resources representative, Human Resources, or the Legal department. If the employee is not comfortable reporting an incident to any of the individuals or departments above, they may contact the Company's Whistleblower Hotline ([www.nfp.alertline.com](http://www.nfp.alertline.com) or 855-296-9085), either by name or anonymously. The website and hotline are administered **by Global Compliance, an independent third party**. Supervisors are required to report any employee complaints or incidents of alleged harassment to their supervisor or department head and their local human resources representative or Human Resources.

An appropriate person will be designated to conduct a prompt investigation of the allegations. Because discrimination, harassment, and sexual harassment issues can be sensitive, reasonable efforts will be taken to protect the privacy and confidentiality of all parties involved to the extent possible. However, confidentiality cannot be assured because it may be necessary to discuss allegations with the accused individual and/or others in order for the Company to conduct a thorough investigation. As with any other investigation conducted by the Company, employees involved in an investigation must:

- Cooperate fully
- Be completely honest and forthcoming
- Agree to limit the flow of information only to those who need to know, as determined by the Company

If, as a result of the investigation, it is determined that unlawful discrimination, harassment, and/or sexual harassment has occurred, the Company will take such prompt remedial action as it deems reasonably necessary under the circumstances to both stop the inappropriate conduct and prevent it from recurring in the future. Depending on the circumstances, appropriate remedial action may take the form of disciplinary action, including termination of employment.

If an investigation results in a finding that an employee knowingly made a false complaint, or a witness knowingly made a false statement, disciplinary action may be taken, up to and including termination of employment.

## **Non-Retaliation**

It is unlawful and expressly against Company policy for any person to retaliate against any other person for making a complaint of discrimination, harassment, and/or sexual harassment, or for cooperating in an investigation of any allegations of discrimination, harassment, and/or sexual harassment. Accordingly, individuals who report incidents of discrimination, harassment, and/or sexual harassment in good faith, or who cooperate in an investigation regarding any such allegations, will not be subject to any form of retaliation. Any employee who believes that they have been retaliated against, or who believes that they have witnessed any form of unlawful retaliation, is required to report it immediately to their supervisor. If this is not possible for any reason, or if the employee is uncomfortable reporting the conduct to their supervisor, the employee must report the conduct to Human Resources or the Legal department. The reporting and investigation of allegations of retaliation will follow the procedures set forth above for the reporting and investigation of discrimination, harassment, and/or sexual harassment. Any person found to have retaliated against an individual for reporting discrimination, harassment, and/or sexual harassment, or for participating in an investigation of allegations of any such conduct, may be subject to disciplinary action, including termination of employment.