

Policy: Equal Employment Opportunity, Non-discrimination, and Anti-Harassment

Policy No.: 1401

Responsible Officer: SVP and CHRO

The Company is committed to the principle of equal employment opportunity for all and all employees and applicants for employment are treated without regard to their race, creed, color, religion, citizenship, national origin, age, marital status, disability status, gender, gender identity, sexual orientation, military service, "pregnancy, childbirth, or related medical conditions, including, but not limited to, lactation"; or other characteristic protected by law. All decisions regarding employment and all other personnel actions are made or administered in accordance with these principles. This policy of the Company is consistent with the requirements of, and objectives set forth in, the various statues, regulations, and executive orders relating to equal employment opportunity.

The Company is also committed to a work environment that respects the dignity and worth of each individual. Inappropriate workplace behavior and unlawful harassment create conditions that are wholly inconsistent with this commitment. The purpose of the policy set forth below is not to regulate the personal morality of employees, but rather to foster a work environment that is free from all forms of harassment.

Discriminatory Harassment is Prohibited

Discriminatory harassment, including sexual and racial harassment, will not be tolerated. This policy applies to all harassment occurring in the work environment, whether on Company premises or in any Company-related setting, and applies regardless of the gender, race or other characteristics of the individuals involved. This policy also covers interactions between employees outside the work environment.

Workplace harassment is unlawful under Title VII of the Civil Rights Act, other federal laws, and many state and local laws. But even harassment that is not illegal may still be a violation of this policy.

Sexual Harassment Defined

For purposes of this policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

• submission to such conduct is either explicitly or implicitly made a term or condition of an individual's employment; or

- submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual; or
- such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

Some examples of what may constitute sexual harassment are: threatening to take or taking employment actions, such as discharge, demotion or reassignment, if sexual favors are not granted; demands for sexual favors in exchange for favorable or preferential treatment; unwelcome and repeated flirtations, propositions or advances; unwelcome physical contact; whistling, leering, improper gestures, tricks, or horseplay; use of stereotypes or offensive, insulting, derogatory or degrading remarks; unwelcome comments about appearance; sexual jokes or use of sexually explicit or offensive language; gender- or sex-based pranks; and the display in the workplace of sexually suggestive objects or pictures. The above list of examples is not intended to be all-inclusive. Care should be taken in informal business situations, including Company parties and business trips.

Other Harassment Defined

For purposes of this policy, other harassment is defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of their race, creed, color, religion, citizenship, national origin, age, marital status, disability status, gender, gender identity, sexual orientation, military service, or other characteristic, which:

- creates an intimidating, hostile or offensive work environment; or
- unreasonably interferes with an individual's work performance.

Some examples of such harassment are: using epithets or slurs; mocking, ridiculing or mimicking another's culture, accent, appearance or customs; threatening, intimidating or engaging in hostile or offensive acts that focus on an individual's race, creed, color, religion, citizenship, national origin, age, marital status, disability status, gender, sexual orientation, military service, or other characteristic protected by law; the displaying on walls, bulletin boards or elsewhere on Company premises, or circulating in the workplace, of written or graphic material that denigrates or shows hostility or aversion toward a person or group because of a particular trait. The above list of examples is not intended to be all-inclusive.

Consensual Relationships

Consensual romantic and/or sexual relationships between an employee with supervisory authority and any subordinate including one not directly under the supervisor, may compromise the Company's ability to enforce its policy against sexual harassment. Consequently, if such relationships arise, they will be considered carefully by the Company, and appropriate action may be taken. Such action may include a change in the responsibilities of the individuals involved in such relationships or transfer of location within the Company. Any supervisory employee involved in such a relationship is

required to report the relationship to his or her direct manager, and while the relationship continues, to all subsequent managers to whom the supervisory employee reports.

Reporting Instances of Harassment

The Company strongly encourages the prompt reporting of all incidents of discriminatory harassment. If an employee believes he or she is being harassed or has observed harassment, the employee should notify promptly any manager, including his or her direct manager. Alternatively, employees may report their concerns to Human Resources or to the Ethics and Employee Advocate Helpline at https://dayzim.ipm.starcompliance.com or by calling 1.877.319.0270. Finally, employees can complaints to an external agency, such as the Equal Employment Opportunity Commission (www.eeoc.gov) or a state or municipal agency with responsibility for antiharassment or anti-discrimination laws. Addendum A to this Policy contains a list, and accompanying contact information, for such agencies across the country. Any management employee that observes discriminatory harassment or receives a complaint of discriminatory harassment must report that observation or complaint to human resources.

Investigation

When an employee reports harassment as specified above, the Company will undertake a prompt and comprehensive investigation appropriate to the circumstances. The specific steps to be taken during the investigation cannot be fixed in advance, but will vary depending upon the nature of the allegations and the information obtained through the investigative process itself. The Company will maintain confidentiality throughout the investigative process to the extent practicable and consistent with the Company's need to undertake a full investigation.

Resolving the Matter

Upon completion of the investigation, the Company will take any necessary appropriate remedial action. Remedial action may include verbal or written counseling, referral to formal counseling, disciplinary suspension or probation, or discharge from the Company. Harassment is a form of employee misconduct, and the Company will subject those who commit harassment, or managers who knowingly allow harassment to continue, to appropriate disciplinary action.

No Retaliation

An individual who reports incidents that they, in good faith, believe violate this policy, or who is involved in the investigation of harassment, will not be subject to reprisal or retaliation. Retaliation is a serious violation of this policy and should be reported immediately. The Company will follow the procedures set forth in this policy for the report and investigation of allegations of retaliation. Any person found to have retaliated against an individual for reporting discriminatory harassment or participating in an

investigation of allegations of such conduct will be subject to appropriate disciplinary action.

Communication

This policy is part of the Company's overall commitment to open communication. The Company encourages any employee with workplace concerns of any nature (including, but not limited to, any alleged discrimination) to bring those concerns to the attention of the direct manager.

ADDENDUM A

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ALABAMA	ALASKA
Alabama Department of Human Resources Office of Equal Employment & Civil Rights 50 Ripley Street Montgomery, AL 36130 334-242-1550 www.dhr.state.al.us/eeo Mobile Human Relations Commission 350 Saint Joseph Street, Room 146 Mobile, AL 36602	Alaska State Commission on Human Rights 800A Suite 204 Anchorage, AK 99501-3669 907-276-4692 https://humanrights.alaska.gov/ Anchorage Equal Rights Commission 620 E. 10th Avenue, Suite 204 Anchorage, AK 99501
ARIZONA	ARKANSAS
Arizona State Attorney General Civil Rights Division 402 W Congress South Bldg. #215 Tucson, AZ 85701 520-628-6500 www.attorney- general.state.az.us/civil_rights/ City of Phoenix Equal Opportunity Department Compliance & Enforcement Division 251 W. Washington, 7th Floor Phoenix, AZ 85003	No state agency. www.eeoc.gov

City of Tucson Equal Opportunity Office 110 E. Pennington P.O. Box 27210 Tucson, AZ 85726 **CALIFORNIA COLORADO** Department of Justice, Civil Rights Colorado Civil Rights Division **Enforcement Section** 1560 Broadway Suite 1050 **Public Inquiry Unit** Denver, CO 80202 P.O. Box 944255 303-894-2997 Sacramento, CA 94244-2550 800-262-4845 in state (916) 322-3360 www.dora.state.co.us/civil-rights caag.state.ca.us/civilrights/ Boulder Office of Human Rights California Dept. of Fair Employment and Department of Housing and Human Services P.O. Box 791 Housing 2014 T St. Suite 210 Boulder, CO 80306 Sacramento, CA 95814 Denver Agency For Human Rights and Community 916-227-2878 Relations www.dfeh.ca.gov/ Anti-Discrimination Office **Davis Human Relations Commission** 303 W. Colfax 23 Russell Boulevard Denver, CO 80204 Davis, CA 95616 Los Angeles Human Relations Commission 200 N. Main Street, Room 700 Los Angeles, CA 90012 San Francisco Human Rights Commission 25 Van Ness Avenue, Suite 800 San Francisco, CA 94102-6033 CONNECTICUT **DELAWARE** Connecticut Commission on Human Delaware Human Relations Division

820 French St. 4th Floor

Rights and Opportunities

21 Grand St.

Hartford, CT 06106

860-541-3400

800-477-5737

www.state.ct.us/chro

New Haven Commission on Equal

Opportunity

200 Orange Street, Room 101

New Haven, CT 06510

Wilmington, DE 19801

302-577-5050

www.state.de.us/sos/human.htm

Delaware Department of Labor

Office of Labor Law Enforcement

4425 N. Market Street

Wilmington, DE 19802

DISTRICT OF COLUMBIA

District of Columbia, Office of Human

Rights

441 4th St. NW Suite 970N

Washington, DC 20001

phone:202-727-3900

fax: 202-724-3786

ohr.dc.gov/

FLORIDA

Florida Commission on Human Relations

Building F Suite 240

325 John Knox Rd.

Tallahassee, FL 32399-4149

850-488-7082

800-342-8170

fchr.state.fl.us/

Alachua County Government Equal Opportunity

Division

P.O. Box 1467

Gainesville, FL 32602

Dade County Equal Opportunity Board

111 NW 1st Street, Suite 650

Miami, FL 33128-1965

Escambia-Pensacola Human Relations Commission

29 S. Spring Street

Pensacola, FL 32501

Pinellas County Office Of Human Rights

400 S. Ft. Harrison Avenue, Suite 300Clearwater, FL

34616

St. Petersburg Human Relations Department

P.O. Box 2842

	St. Petersburg, FL 33731
	Tampa Office of Human Rights
	712 W. Ross Avenue
	Tampa, FL 33602
GEORGIA	HAWAII
Georgia Human Relations Commission	Hawaii Civil Rights Commission
225 Peachtree St. NE Suite 207	830 Punchbowl St. Room 411
Atlanta, GA 30303	Honolulu, HI 96813
404-656-6046	808-586-8636
www.ganet.org/ghrc	www.state.hi.us/hcrc
IDAHO	ILLINOIS
Idaho Human Rights Commission	Illinois Dept. of Human Rights
1109 Main St. 4th Floor	100 W Randolph St. Suite 10-100
P.O. Box 83720	Chicago, IL 60601
Boise, ID 83720	312-814-6200
208-334-2873	800-662-3942
www.state.id.us/ihrc	www.state.il.us/dhr
	Cook County Commission on Human Rights
	69 W. Washington
	Chicago, IL 60602
	Peoria Equal Opportunity Office
	City Hall, Room 108
	419 Fulton Street
	Peoria, IL 61602
INDIANA	IOWA
Indiana Civil Rights Commission	Iowa Civil Rights Commission
100 N Senate Ave. Room N103	211 E Maple St.
Indianapolis, IN 46204	Grimes State Office Bldg.
317-232-2600	Des Moines, IA 50309-1858
800-628-2909	515-281-4121

www.state.in.us/icrc

Anderson Human Relations Commission

120 E. 8th Street

P.O. Box 2100

Anderson, IN 46018

Bloomington Human Rights Commission

P.O. Box 100

Bloomington, IN 47402-0100

Columbus Human Rights Commission

123 Washington Street,

Room 5

Columbus, IN 47201

800-457-4416

www.state.ia.us/government/crc

Burlington Human Rights Commission

400 Washington Street

Burlington, IA 52601

Davenport Civil Rights Commission

423 E. 32nd Street, Suite Two

Davenport, IA 52803

Des Moines Human Rights Commission

602 E. 1st Street

Des Moines, IA 50309-1881

Iowa City Human Rights Commission

410 E. Washington lowa City, IA 52204

KANSAS

Kansas Human Rights Commission

900 SW Jackson St. Suite 851-S

Topeka, KS 66612-1258

785-296-3206

www.ink.org/public/khrc

Salina Human Relations Department

P.O. Box 736

Salina, KS 67402-0736

KENTUCKY

Office of Equal Employment Opportunity and Contract

Compliance

Capitol Annex, Room 370

Frankfort, KY 40601

Telephone: (502) 564-2874

Facsimile: (502) 564-1055

www.state.ky.us/agencies/finance/descript/eeoc.htm

Kentucky Commission On Human Rights

332 W. Broadway, 7th Floor

Louisville, KY 40202

Lexington- Fayette Uraban County Human Rights

Commission

162 E. Main Street, Suite 226

Lexington, KY 40507-1318

Louisville and Jefferson County Human Relations

Commission

200 S. 7th Street, Suite 120

Louisville, KY 40202

LOUISIANA

Louisiana Commission on Human Rights

1001 N. 23rd St., Suite 262

Baton Rouge, Louisiana 70802

Phone: (225) 342-6969

Fax: (225) 342-2063

TDD: 1-888-248-0859

www.gov.state.la.us/depts/lchr.htm

New Orleans Human Relations

Commission

City of New Orleans

1300 Perdido Street, Room 8E07

New Orleans, LA 70112

MAINE

Maine Human Rights Commission

51 State House Station

Augusta, ME 04333-0051

207-624-6050

www.state.me.us/mhrc/

MARYLAND

Maryland Human Rights Commission

6 St. Paul St. 9th Floor

Baltimore, MD 21202-1631

410-767-8600

800-637-6247 in state

www.mchr.state.md.us

Baltimore Community Relations

Commission

10 N. Calvert Street

Equitable Building, Suite 915

Baltimore, MD 21202

Howard County Office of Human Rights

6751 Columbia Gateway Drive, 2nd Floor

MASSACHUSETTS

Massachusetts Commission Against Discrimination

1 Ashburton Pl., Room 601

Boston, MA 02108-1518

617-727-3990

https://www.mass.gov/orgs/massachusetts-

commission-against-discrimination

New Bedford Office Of Equal Opportunity

181 Hillman Street

Bldg. 9, Room 103

New Bedford, MA 02740

Columbia, MD 21046

Rockville Human Rights Commission
Department of Community Services
111 Maryland Avenue
Rockville, MD 20850

MISSISSIPPI

No state agency.

www.eeoc.gov

MICHIGAN

Michigan Department of Civil Rights

Victor Bldg. Suite 700

201 N Washington Square

517-335-3165

www.mdcr.state.mi.us/mdcr/

Ann Arbor Human Rights Office

P.O. Box 8647

Ann Arbor, MI 48107

Detroit Department Of Human Rights

2 Woodward

Detroit, MI 48226

MINNESOTA

Minnesota Department Of Human Rights

Army Corps of Engineers Center

190 E. 5th Street. Suite 700

St. Paul, MN 55101

St. Paul Department Of Human Rights

15 W. Kellogg Boulevard,

Room 900

St. Paul, MN 55102-1681

MISSOURI

Missouri Commission Human Rights

Department of Labor and Industrial Relations

P.O. Box 1129

3315 W Truman Blvd.

Jefferson City, MO 65102-3325

573-751-3325

www.dolir.state.mo.us/hr

Kansas City (Missouri) Human Rights Department

City Hall, 4th Floor

414 E. 12th Street

Kansas City, MO 64106

St. Louis Civil Rights Enforcement Agency

906 Olive, Suite 1100

	St. Louis, MO 63101
MONTANA	NEBRASKA
Dept. of Labor and Industry, Human	Nebraska Equal Opportunity Commission
Rights Commission	301 Centennial Mall South
P.O. Box 1728	P.O. Box 94934
Helena, MT 59620	Lincoln, NE 68509
406/444-4344	402-471-2024
800-542-0807 in state	800-642-6112
dli.state.mt.us/decisions/hrcdec.htm	www.nol.org/home/NEOC/
	Omaha Human Relations Department
	1819 Farnum Street, Suite 502
	Omaha, NE 68183
NEVADA	NEW HAMPSHIRE
Dept. of Employment Training and	New Hampshire Human Rights Commission
Rehabilitation	2 Chenell Dr.
Nevada Equal Rights Commission	Concord, NH 03301
1515 E. Tropicana Ave. Suite 590	603-271-2767
Las Vegas, NV 89119-6522	www.state.nh.us/hrc
702-486-7161	
detr.state.nv.us	
NEW JERSEY	NEW MEXICO
New Jersey Dept. of Law and Public	New Mexico Human Rights Division
Safety	Dept. of Labor
Division on Civil Rights	1596 Pacheco St.
140 E Front St.	Santa Fe, NM 87502
P.O. Box 090	505-827-6838
Trenton, NJ 08625-0090	800-566-9471
609-292-4605	www3.state.nm.us/dol
www.state.nj.us/lps/dcr	

New York State Division of Human Rights North Carolina Human Relations Commission 55 W 125th St. 217 W Jones St. 4th Floor New York, NY 10027 Raleigh, NC 27603 212-961-8400 919-733-7996 www.doa.state.nc.us/hrc/homepage.htm https://dhr.ny.gov/ New York City Commission on Human Rights 40 Rector Street New York, NY 10006 https://www1.nyc.gov/site/cchr/index.page NORTH DAKOTA OHIO North Dakota Dept. of Labor, Division of Ohio Civil Rights Commission **Human Rights** 111 E Broad St. Suite 301 State Capital Columbus, OH 43205 600 East Blvd. 614-466-5928 Bismarck, ND 58505 www.state.oh.us/crc 701-328-2660 800-582-8032 www.state.nd.us/labor/Division of Human Rights.htm **OKLAHOMA OREGON** Oklahoma Civil Rights Commission Oregon Civil Rights Division 2101 N Lincoln Blvd. Bureau of Labor and Industry Oklahoma City, OK 73105 800 NE Oregon St. #32 Suite 1070 405-521-2360 Portland, OR 97232 503-731-4075 Tulsa Department of Human Rights www.boli.state.or.us/civil 707 S. Houston, Room 303 Tulsa, OK 74127 **PENNSYLVANIA RHODE ISLAND** Pennsylvania Human Relations Rhode Island Commission for Human Rights 10 Abbott Park Pl. Commission

301 Chestnut Street, Suite 300

Harrisburg, PA 17101

Voice: (717) 787-4410

Telephone: (717) 783-9308 or (717) 787-

4087

www.phrc.state.pa.us/

Allentown Human Relations Commission

435 Hamilton Street

Allentown, PA 18101-1699

Philadelphia Commission On Human

Relations

34 S. 11th Street, 6th Floor

Philadelphia, PA 19107-3695

York Human Relations Commission

225 E. Princess Street

York, PA 17403

Providence, RI 02903-3768

401-222-2661

www.state.ri.us/manual/data/queres/stdept_.idc?id=16

Providence Human Relations Commission

151 Weybosset Street

Providence, RI 02903

SOUTH CAROLINA

South Carolina Human Affairs

Commission

P.O. Box 4490

2611 Forest Dr. Suite 200

Columbia, SC 29240

803-737-7800

www.state.sc.us/schac/

SOUTH DAKOTA

South Dakota Dept. of Commerce and Regulation

Division of Human Rights

118 W Capital Ave.

Pierre, SD 57501

605-773-4493

www.state.sd.us/dcr/hr

Sioux Falls Human Relations Commission

224 W. 9th

Sioux Falls, SD 57104-6407

TENNESSEE

Tennessee Human Rights Commission

530 Church Street, Suite 400

Cornerstone Square Building

Nashville, TN 37243-0745

Phone: 615-741-5825

TEXAS

Texas Commission on Human Rights

P.O. Box 13493

6830 Highway 290 East, Suite 250

Austin, TX 78711

512-437-3450

https://www.tn.gov/humanrights.html	www.state.tx.us/agency/344.html
	Fort Worth Human Relations Commission
	1000 Throckmorton
	Fort Worth, TX 76102
UTAH	VERMONT
Utah Anti-Discrimination Division	Vermont Human Rights Commission
P.O. Box 146640	135 State St. Drawer 33
Salt Lake City, UT 84114-6640	Montpelier, VT 05633-6301
801-530-6801	802-828-2480
laborcommission.utah.gov/	www.hrc.state.vt.us/
VIRGINIA	WASHINGTON
Council on Human Rights	Washington State Human Rights Commission
Suite 1202 Washington Bldg.	P.O. Box 42490
1100 Bank St.	711 S Capital Way #402
Richmond, VA 23219	Olympia, WA 98504-2490
804-225-2292	360-753-6770
800-633-5510	800-233-3247
www.chr.state.va.us	https://www.hum.wa.gov/
Alexandria Office Of Human Rights	King County Office Of Civil Rights Enforcement
110 N. Royal Street, Suite 201	King County Courthouse, Room E 224
Alexandria, VA 22314	516 Third Avenue
Arlington Human Rights Commission	Seattle, WA 98104-2312
2100 Clarendon Boulevard, Suite 106	Souttle Office For Civil Pights
Arlington, VA 22201	Seattle Office For Civil Rights 700 Third Avenue, Suite 250
Allington, VA 22201	Seattle, WA 98104-1849
	Seattle, WA 30104-1049
WEST VIRGINIA	WISCONSIN
West Virginia Human Rights Commission	Wisconsin Equal Rights Division
1321 Plaza East Room 108A	Dept. of Workforce Development
Charleston, WV 25301	P.O. Box 8928
304-558-2616	201 E Washington Ave. Room 407
888-676-5546	Madison, WI 53708-8928

https://hrc.wv.gov/Pages/default.aspx	608-266-6860
Beckley Human Rights Commission	https://dwd.wisconsin.gov/er/contacts.htm
409 S. Kanawha Street/	Madison Equal Opportunities Commission
P.O. Drawer AJ	210 Martin Luther King, Jr., Boulevard
Beckley, WV 25801	Madison, WI 53710
Charleston Human Rights Commission 115 Lee Street, W. Charleston, WV 25302 Huntington Human Relations Commission 824 Fifth Avenue, Suite 200 Huntington, WV 25701	
WYOMING	
Wyoming Department of Employment Labor Standards Fair Employment Program 1510 E. Pershing, West Wing, Suite 2015 Cheyenne, WY 82002 https://dws.wyo.gov/dws-division/labor-standards/	