



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 statutes, 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.ethix360.com> or by calling 1.877.319.0270. Finally, employees can report complaints to an external agency, such as the Equal Employment Opportunity Commission (www.eeoc.gov) or a state or municipal agency with responsibility for anti-harassment 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

ALABAMA 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 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 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	ARKANSAS No state agency. www.eeoc.gov

<p>City of Tucson Equal Opportunity Office 110 E. Pennington P.O. Box 27210 Tucson, AZ 85726</p>	
<p>CALIFORNIA</p> <p>Department of Justice, Civil Rights Enforcement Section Public Inquiry Unit P.O. Box 944255 Sacramento, CA 94244-2550 (916) 322-3360 caag.state.ca.us/civilrights/ California Dept. of Fair Employment and Housing 2014 T St. Suite 210 Sacramento, CA 95814 916-227-2878 www.dfeh.ca.gov/ Davis Human Relations Commission 23 Russell Boulevard Davis, CA 95616</p> <p>Los Angeles Human Relations Commission 200 N. Main Street, Room 700 Los Angeles, CA 90012</p> <p>San Francisco Human Rights Commission 25 Van Ness Avenue, Suite 800 San Francisco, CA 94102-6033</p>	<p>COLORADO</p> <p>Colorado Civil Rights Division 1560 Broadway Suite 1050 Denver, CO 80202 303-894-2997 800-262-4845 in state www.dora.state.co.us/civil-rights Boulder Office of Human Rights Department of Housing and Human Services P.O. Box 791 Boulder, CO 80306</p> <p>Denver Agency For Human Rights and Community Relations Anti-Discrimination Office 303 W. Colfax Denver, CO 80204</p>
<p>CONNECTICUT</p> <p>Connecticut Commission on Human Rights and Opportunities</p>	<p>DELAWARE</p> <p>Delaware Human Relations Division 820 French St. 4th Floor</p>

<p>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</p>	<p>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</p>
<p>DISTRICT OF COLUMBIA</p> <p>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/</p>	<p>FLORIDA</p> <p>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</p> <p>Dade County Equal Opportunity Board 111 NW 1st Street, Suite 650 Miami, FL 33128-1965</p> <p>Escambia-Pensacola Human Relations Commission 29 S. Spring Street Pensacola, FL 32501</p> <p>Pinellas County Office Of Human Rights 400 S. Ft. Harrison Avenue, Suite 300Clearwater, FL 34616</p> <p>St. Petersburg Human Relations Department P.O. Box 2842</p>

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

<p>www.state.in.us/icrc</p> <p>Anderson Human Relations Commission</p> <p>120 E. 8th Street P.O. Box 2100 Anderson, IN 46018</p> <p>Bloomington Human Rights Commission P.O. Box 100 Bloomington, IN 47402-0100</p> <p>Columbus Human Rights Commission 123 Washington Street, Room 5 Columbus, IN 47201</p>	<p>800-457-4416</p> <p>www.state.ia.us/government/crc</p> <p>Burlington Human Rights Commission 400 Washington Street Burlington, IA 52601</p> <p>Davenport Civil Rights Commission 423 E. 32nd Street, Suite Two Davenport, IA 52803</p> <p>Des Moines Human Rights Commission 602 E. 1st Street Des Moines, IA 50309-1881</p> <p>Iowa City Human Rights Commission 410 E. Washington Iowa City, IA 52204</p>
<p>KANSAS</p> <p>Kansas Human Rights Commission 900 SW Jackson St. Suite 851-S Topeka, KS 66612-1258 785-296-3206 www.ink.org/public/khrc</p> <p>Salina Human Relations Department P.O. Box 736 Salina, KS 67402-0736</p>	<p>KENTUCKY</p> <p>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</p> <p>Kentucky Commission On Human Rights 332 W. Broadway, 7th Floor Louisville, KY 40202</p> <p>Lexington- Fayette Urban County Human Rights Commission 162 E. Main Street, Suite 226 Lexington, KY 40507-1318</p>

	<p>Louisville and Jefferson County Human Relations Commission</p> <p>200 S. 7th Street, Suite 120</p> <p>Louisville, KY 40202</p>
<p>LOUISIANA</p> <p>Louisiana Commission on Human Rights</p> <p>1001 N. 23rd St., Suite 262</p> <p>Baton Rouge, Louisiana 70802</p> <p>Phone: (225) 342-6969</p> <p>Fax: (225) 342-2063</p> <p>TDD: 1-888-248-0859</p> <p>www.gov.state.la.us/depts/lchr.htm</p> <p>New Orleans Human Relations Commission</p> <p>City of New Orleans</p> <p>1300 Perdido Street, Room 8E07</p> <p>New Orleans, LA 70112</p>	<p>MAINE</p> <p>Maine Human Rights Commission</p> <p>51 State House Station</p> <p>Augusta, ME 04333-0051</p> <p>207-624-6050</p> <p>www.state.me.us/mhrc/</p>
<p>MARYLAND</p> <p>Maryland Human Rights Commission</p> <p>6 St. Paul St. 9th Floor</p> <p>Baltimore, MD 21202-1631</p> <p>410-767-8600</p> <p>800-637-6247 in state</p> <p>www.mchr.state.md.us</p> <p>Baltimore Community Relations Commission</p> <p>10 N. Calvert Street</p> <p>Equitable Building, Suite 915</p> <p>Baltimore, MD 21202</p> <p>Howard County Office of Human Rights</p> <p>6751 Columbia Gateway Drive, 2nd Floor</p>	<p>MASSACHUSETTS</p> <p>Massachusetts Commission Against Discrimination</p> <p>1 Ashburton Pl., Room 601</p> <p>Boston, MA 02108-1518</p> <p>617-727-3990</p> <p>https://www.mass.gov/orgs/massachusetts-commission-against-discrimination</p> <p>New Bedford Office Of Equal Opportunity</p> <p>181 Hillman Street</p> <p>Bldg. 9, Room 103</p> <p>New Bedford, MA 02740</p>

<p>Columbia, MD 21046</p> <p>Rockville Human Rights Commission Department of Community Services 111 Maryland Avenue Rockville, MD 20850</p>	
<p>MICHIGAN</p> <p>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</p> <p>Detroit Department Of Human Rights 2 Woodward Detroit, MI 48226</p>	<p>MISSISSIPPI</p> <p>No state agency.</p> <p>www.eeoc.gov</p>
<p>MINNESOTA</p> <p>Minnesota Department Of Human Rights Army Corps of Engineers Center 190 E. 5th Street. Suite 700 St. Paul, MN 55101</p> <p>St. Paul Department Of Human Rights 15 W. Kellogg Boulevard, Room 900 St. Paul, MN 55102-1681</p>	<p>MISSOURI</p> <p>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</p> <p>St. Louis Civil Rights Enforcement Agency 906 Olive, Suite 1100</p>

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

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

<p>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</p> <p>Philadelphia Commission On Human Relations 34 S. 11th Street, 6th Floor Philadelphia, PA 19107-3695</p> <p>York Human Relations Commission 225 E. Princess Street York, PA 17403</p>	<p>Providence, RI 02903-3768 401-222-2661 www.state.ri.us/manual/data/queries/stdept_.idc?id=16 Providence Human Relations Commission 151 Weybosset Street Providence, RI 02903</p>
<p>SOUTH CAROLINA</p> <p>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/</p>	<p>SOUTH DAKOTA</p> <p>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</p>
<p>TENNESSEE</p> <p>Tennessee Human Rights Commission 530 Church Street, Suite 400 Cornerstone Square Building Nashville, TN 37243-0745 Phone: 615-741-5825</p>	<p>TEXAS</p> <p>Texas Commission on Human Rights P.O. Box 13493 6830 Highway 290 East, Suite 250 Austin, TX 78711 512-437-3450</p>

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

<p>https://hrc.wv.gov/Pages/default.aspx Beckley Human Rights Commission 409 S. Kanawha Street/ P.O. Drawer AJ Beckley, WV 25801</p> <p>Charleston Human Rights Commission 115 Lee Street, W. Charleston, WV 25302</p> <p>Huntington Human Relations Commission 824 Fifth Avenue, Suite 200 Huntington, WV 25701</p>	<p>608-266-6860 https://dwd.wisconsin.gov/er/contacts.htm Madison Equal Opportunities Commission 210 Martin Luther King, Jr., Boulevard Madison, WI 53710</p>
<p>WYOMING</p> <p>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/</p>	