



Milestone

1.2 Equal Employment Opportunity, Anti-Discrimination and Anti-Harassment

1. Equal Employment Opportunity and Non-Discrimination

The Company is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that provides equal employment opportunities and prohibits discrimination.

Equal Employment Opportunity has been, and will continue to be, a fundamental principle of the Company where all employment decisions are based upon personal capabilities and qualifications without regard to race, color, religion, sex, pregnancy, sexual orientation, gender identity, genetic information, age, national origin, physical or mental disability, military status, veteran status, citizenship status, protected activity (e.g. opposition to prohibited discrimination or other unlawful activity or participation in a statutory complaint process), or any other protected characteristic as established by law. The Company prohibits and will not tolerate any such discrimination.

This policy applies to all phases of employment and personnel actions including, but not limited to, recruitment, hiring, promotion, demotion, transfers, rates of pay and other forms of compensation, selection for training, discipline and termination of employment. The Human Resources Department has overall responsibility for this policy and maintains reporting and monitoring procedures.

2. Anti-Harassment

The Company prohibits all forms of harassment including sexual harassment and harassment based on race, color, religion, national origin, sex, pregnancy, sexual orientation, gender identity, genetic information, age, disability, military status, veteran status, citizenship status, protected activity, or any other characteristic or protected by law. This applies to all employees and non-employees at Company work sites or functions.

Harassment is any unwelcome communication or action towards another individual that (1) impacts their ability to conduct their work because of the creation of a hostile or offensive work environment and/or (2) when it results in an adverse employment decision.

Examples of harassing conduct includes, but is not limited to the following:

- Making comments about a person's clothing, body, or looks;
- Mimicking a physical characteristic or impediment of a disabled employee;
- Making derogatory jokes or personal insults, using racial slurs, and expressing disgust or intolerance toward a particular race, gender, or other protected class;
- Labeling someone or name-calling based on protected classes, upbringing, or socioeconomic level;
- Mocking a worker's accent;
- Making threats or displaying discriminatory symbols;
- Using derogatory language and homophobic slurs, making disparaging remarks about someone's perceived sexual orientation, or intentionally misgendering someone;

- Denying someone's access to a restroom consistent with their gender identity;
- Wearing clothing that could be offensive to another ethnic group (e.g. tasteless Halloween costume);
- Making negative comments about an employee's personal religious beliefs;
- Posting, distributing, or otherwise circulating materials containing offensive content; or
- Excluding a co-worker or subordinate employee of another race or sexual orientation, etc. from staff meetings or failing to inform the employee about company social events or opportunities for advancement.

Sexual harassment of any kind will not be tolerated. Sexual harassment is prohibited regardless of gender. Prohibited conduct includes many forms of offensive behavior including, but not limited to, the following:

- Unwelcome sexual advances;
- Requests for sexual favors
- Acts of physical aggression, intimidation, hostility, threats, or unequal treatment based on sex (even if not sexual in nature);
- Visual conduct such as leering, making sexual gestures, displaying sexually suggestive objects, photos, screen savers, cartoons or posters,
- Sending obscene, pornographic or otherwise inappropriate communications, including suggestive or obscene letters, invitations, notes, emails or messages,
- Making or using derogatory comments, epithets, slurs and sexist or sexual jokes,
- Graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, and
- Physical conduct such as touching, assault, impeding or blocking movement.

Because it is difficult to predict when conduct or comments might be "unwelcome" or perceived as offensive, employees should avoid all such conduct and behave in a professional manner at all times. The Company prohibits inappropriate behavior regardless of whether anyone has complained about the inappropriate behavior, and regardless of whether the person engaging in the inappropriate behavior intended for it to be offensive. This policy also prohibits inappropriate behavior which was intended only as a joke or was not supposed to be seen or overheard by others.

No manager, employee, or non-employee shall threaten or insinuate that another employee's or applicant's refusal to submit to sexual advances will adversely affect any aspect of that person's employment. No manager or employee shall promise, imply, or grant any preferential treatment to another employee or applicant in exchange for engaging in sexual conduct. No manager or employee shall engage in another inappropriate behavior which has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

3. Rights and Responsibilities

If an employee believes they are being subjected to conduct or comments that violate this policy, and they feel comfortable doing so, the employee should tell the individual engaging in the behavior that their conduct is offensive and ask that it stop. If that does not work, or if the employee feels uncomfortable doing that, the employee must immediately report these matters to their supervisor, the Senior Manager over the area, to any other member of management, the EEO Officer, Human Resources, or the Ethics Hotline at 888-THG-1930 or THG.[integrareport.com](https://www.thg.com/integrareport). If the employee believes they have been subjected to behavior that violates this policy by the supervisor or other leadership with authority over them, the employee should immediately report the matter to the EEO Officer, Human Resources or the Ethics Hotline at 888-THG-1930 or THG.[integrareport.com](https://www.thg.com/integrareport).

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. For this reason, an employee should always make a report as soon as possible and should not wait for a situation to become worse or unbearable before making a report.

4. Managers' Responsibility

All managers are responsible for creating and maintaining a work environment free from harassment. If a complaint is made to a manager, the manager is required to notify the EEO Officer or Human Resources.

5. Retaliation Is Prohibited

The Company prohibits retaliation against any individual that reports discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action, up to and including termination. Any employee who feels that he or she has been threatened with, or subjected to, such reprisal or retaliation should immediately report the reprisal or retaliation to his or her supervisor, EEO Officer, or Human Resources.

While the Company is committed to preventing and correcting unlawful discrimination, harassment, other inappropriate behavior, and retaliation, it also recognizes that false accusations may harm the innocent party who is falsely accused. Accordingly, any employee who, after an investigation, is found to have knowingly made a false accusation of discrimination, harassment, other inappropriate conduct, or retaliation will be subject to appropriate disciplinary action. If an employee makes a report of what he or she believes in good faith to be discrimination, harassment, other inappropriate behavior, or retaliation, the employee will not be subjected to disciplinary action, even if the employee turns out to have been mistaken.

6. The Investigation

Any reported allegations of harassment, discrimination, or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. Confidentiality will be maintained throughout the investigation process to the extent consistent with adequate investigation and appropriate corrective action.

7. Responsive Action

Misconduct constituting harassment, discrimination, or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling, and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination, or termination of employment, as the Company believes appropriate under the circumstances.

Finally, these policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions in order to avoid allegations of harassment.

Individuals who have questions or concerns about this policy should contact Human Resources.

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