



## **THE CONFERENCE BOARD**

### **EQUAL EMPLOYMENT OPPORTUNITY POLICY,** **INCLUDING AFFIRMATIVE ACTION PLAN AND** **POLICIES AGAINST DISCRIMINATION AND HARASSMENT**

As a global entity, diversity and inclusion matter at TCB. We want to attract the best talent. To meet this goal, we must have a workplace where differences are appreciated and respected.

TCB strictly prohibits discrimination against any employee or job candidate because of the individual's race, color, gender, religion, national origin, age, sexual orientation, disability, gender identity or expression, marital status, domestic partnership status, genetic predisposition or carrier status, military status, or any other characteristic protected by law. This policy applies to all TCB activities, including but not limited to, recruitment, hiring, compensation, assignment, training, promotion, self-development opportunities, social and recreational programs, discipline and discharge. As detailed later, this policy also bans discriminatory harassment.

TCB will provide reasonable accommodation consistent with the law to otherwise qualified employees and prospective employees with a disability and to employees and prospective employees with needs related to their religious observance or practices. What constitutes a reasonable accommodation depends on the circumstances, and thus will be addressed by TCB on a case-by-case basis.

#### **ANTI-DISCRIMINATION POLICY**

TCB strictly prohibits discrimination against any employee or job candidate because of the individual's race, color, gender, religion, national origin, age, sexual orientation, disability, gender identity or expression, marital status, domestic partnership status, genetic predisposition or carrier status, military status, or any other characteristic protected by law. This policy applies to all TCB activities, including but not limited to, recruitment, hiring, compensation, assignment, training, promotion, self-development opportunities, social and recreational programs, discipline and discharge. As detailed in the Employee Handbook, this policy also bans discriminatory harassment.

TCB will provide reasonable accommodation consistent with the law to otherwise qualified employees and prospective employees with a disability and to employees and prospective employees with needs related to their religious observance or practices. What constitutes a reasonable accommodation depends on the circumstances, and this will be addressed by TCB on a case-by-case basis.

## **ANTI-HARASSMENT POLICY**

TCB prohibits conduct that constitutes or could lead or contribute to harassment based on race, color, sex (whether or not of sexual nature), religion, national origin, age, sexual orientation, disability, gender identity or expression, marital status, domestic partnership status, genetic predisposition or carrier status, military status or any other characteristic protected by law. Examples of such conduct include:

- offensive language and ethnic slurs, verbally or in writing;
- threatening, intimidating, or hostile acts directed at a particular individual based upon their membership in a protected category, including their gender, religion, sexual orientation, color, national origin, etc.; and/or
- engaging in prohibited conduct via electronic means, including via the internet, intranet or the email system, and viewing or distributing offensive material.

Harassment does not require intent to offend. Thus, inappropriate conduct meant as a joke, a prank, or even a compliment can lead or contribute to harassment and is prohibited.

### Sexual Harassment

Sexual harassment is a specific type of discriminatory harassment. According to the Equal Employment Opportunity Commission's (EEOC) guidelines, unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitutes sexual harassment when:

- (1) submission to such conduct is made explicitly or implicitly a term or condition of an individual's employment;
- (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- (3) such conduct has the purpose or effect of unreasonable interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

TCB prohibits conduct that constitutes or could lead or contribute to sexual harassment. Examples of such conduct are:

- unwelcome sexual comments, advances, or propositions;
- inappropriate touching of an individual's body;
- graphic verbal comments about an individual's body or appearance;
- derogatory words used to describe an individual; or
- the use of computers (including via the internet and intranet) or the email system to display or distribute sexually explicit images, messages, or cartoons.

Additional rules apply to individuals with supervisory authority at TCB. TCB strictly prohibits anyone with a supervisory role to:

(a) threaten or imply that an individual's submission to or rejection of a sexual advance will in any way influence any decision regarding that individual's employment, performance evaluation, advancement, compensation, assignments, discipline, discharge, or any other term or condition of employment; or

(b) make any employment decision concerning an individual on such basis. Supervisors are required to immediately report complaints received from employees to the Human Resources Department and may be subject to disciplinary action for failure to do so.

## **REPORTING PROCEDURES**

If you believe that you or another individual has been subjected to any conduct of the type described in this policy, you are urged and expected to promptly report the incident to your manager or the Senior Vice President, Human Resources & Chief Diversity Officer. If the complaint involves the SVP of HR, employees may contact the Chief Executive Officer. Employees may also call the employee hotline at **1-800-556-3048**, 24 hours a day. The Hotline will need to collect specific and detailed information regarding the complaint so that it may be investigated. Employees should choose whichever of the listed individuals they feel most comfortable contacting under the circumstances. Employees should report the conduct regardless of the offender's position at TCB, and should also report the conduct even if the offender is not employed at TCB (for example, a vendor, customer, consultants, or "temps"). An employee's prompt reporting is very important so that TCB can take appropriate action to protect individuals from such conduct. All reports will be promptly investigated and appropriate action taken. In conducting its investigations, TCB will make every effort to maintain confidentiality of all individuals involved to the extent possible.

Appropriate disciplinary action for violations of these policies may include unpaid suspension and termination of employment, and individuals who violate these policies may also be subject to personal legal and financial liability under applicable law. In certain circumstances, matters may require TCB to report incidents to federal or local law enforcement.

### **NO RETALIATION**

TCB has a zero tolerance policy barring retaliation against an employee based upon a report of a violation of these EEO, Anti-discrimination and Anti-harassment policies. Individuals will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities involving the policies:

- filing a complaint;
- assisting or participating in an investigation, compliance review, hearing, or any other related activity;
- opposing any act or practice made unlawful by the equal opportunity laws; or
- exercising any other right protected by the equal opportunity laws.

In the event you believe that you have been subjected to retaliation, please promptly report the incident, as described above, so that the matter may be investigated and appropriate action taken.