



California - Anti-Sexual Harassment and Anti-Discrimination Policy

SterlingRisk is committed to providing and maintaining a work environment free from all forms of sexual harassment and discrimination. All employees are entitled to a workplace free of unlawful discrimination.

Harassment

Prohibited harassment includes any type of unwelcomed or unsolicited actions that are deemed to be offensive, abusive, threatening, intimidating, or disruptive to others. These actions can include, but are not limited to, making comments or gestures, touching, leering, displaying offensive materials, and any form of stalking or bullying.

Retaliation

SterlingRisk also prohibits retaliation against anyone who opposes a discriminatory practice, files a charge or complaint alleging discrimination, provides information in a Company investigation, or testifies, assists, or participates in an investigation, lawsuit, hearing, or proceeding relating to alleged discrimination.

Reporting Violations

Any employee who is aware of a violation of this policy is to report it to their immediate supervisor, manager, or Chief Talent Officer.

Enforcement

Employees who violate this policy will face disciplinary action, up to and including termination of employment.

All employees are expected to assume responsibility for maintaining a work environment that is free from discrimination, harassment, and retaliation. Employees are encouraged to promptly report conduct that they believe violates this policy so that SterlingRisk has an opportunity to address and resolve any concerns. Managers and supervisors are required to promptly report conduct that they believe violates this policy to Chief Talent Officer. SterlingRisk is committed to responding to alleged violations of this policy in a timely and fair manner and to taking appropriate action aimed at ending the prohibited conduct.

Scope of Protection

This policy applies to SterlingRisk applicants and Employees (co-workers, supervisors and managers). As used in this policy, the term "Employee" includes, contractors and volunteers in the workplace. In addition, this policy extends to conduct with a connection to an employee's



work, even when the conduct takes place away from SterlingRisk's premises, such as a business trip or business-related social function.

Employee Rights

- The right to a discrimination, harassment, and retaliation-free work environment.
- The right to file a complaint of discrimination, harassment, or retaliation. Employees are encouraged to report inappropriate conduct immediately to their immediate supervisor, manager, or Chief Talent Officer and, whenever possible, to put the complaint or concern in writing.
- The right to a full, impartial and prompt investigation by a SterlingRisk representative or designee into allegations of conduct that would violate this policy.
- The right to be timely informed of appropriate information related to the outcome of an investigation either as a complainant or a respondent in the investigation.
- The right to be represented by a person of the complainant's choosing at each and all steps of the complaint process.
- The right to be free from retaliation or reprisal after filing a complaint or participating in the complaint process.
- The right to file a complaint directly with the California Department of Fair Employment and Housing, the federal Equal Employment Opportunity Commission or other appropriate state or federal agencies, or to file a civil action in the appropriate court.

Discrimination

Discrimination may include but is not necessarily limited to: hostile or demeaning behavior towards applicants or employees because of their protected characteristic; allowing the applicant's or employee's protected characteristic to be a factor in hiring, promotion, compensation or other employment related decisions unless otherwise permitted by applicable law, and providing unwarranted assistance or withholding work-related assistance, cooperation, and/or information to applicants or employee because of their protected characteristic.

Harassment

Harassment is defined as unwelcome disrespectful or unprofessional conduct, including disrespectful or unprofessional conduct based on any of the protected characteristics listed above. Harassment can be verbal (such as slurs, jokes, insults, epithets, gestures, or teasing), visual (such as the posting or distribution of offensive posters, symbols, cartoons, drawings, computer displays, or emails), or physical conduct (such as physically threatening another person, blocking someone's way, or making physical contact in an unwelcome manner).

Sexual Harassment

Sexual harassment is a form of unlawful sex discrimination. It includes harassment on the basis of sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender,



gender identity, gender expression or sexual orientation. It may include harassment behaviors described above, as well as other unwelcome sex-based conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities, or other verbal or physical conduct of a sexual nature. Sexually harassing conduct need not be of a sexual nature or be motivated by sexual desire. It may include situations that began as reciprocal relationships, but that later cease to be reciprocal.

Sexual Harassment is generally categorized into two types:

1. Hostile Work Environment Sexual Harassment

A sexually harassing hostile work environment includes, but is not limited to, unwelcome conduct on the basis of sex, gender identity, gender expression, or sexual orientation by any person in the workplace that unreasonably interferes with work performance and/or creates an intimidating, hostile or otherwise offensive working environment. When unwelcome, examples include:

- Sexual advances, flirtation, teasing, sexually suggestive or obscene letters, invitations, notes, emails, voicemails or gifts;
- Sex, gender or sexual orientation-related comments, slurs, jokes, remarks, or epithets;
- Leering, obscene, or vulgar gestures or making sexual gestures;
- Displaying or distributing sexually suggestive or derogatory objects, pictures, cartoons, or posters;
- Impeding or blocking movement, touching, or assaulting others;
- Reprisals or threats after a negative response to sexual advances; or
- Conduct or comments consistently targeted at one gender, even if the content is not sexual.

2. Quid Pro Quo Sexual Harassment

Quid Pro Quo Sexual Harassment (“this for that”) occurs when a person in authority tries to trade job benefits for sexual favors. Examples of quid pro quo sexual harassment include:

- Submission to sexual conduct (or other harassing conduct) is made explicitly or implicitly a term or condition of an individual’s employment; or
- Submission to or rejection of the conduct by an employee is used as the basis for employment decisions affecting the employees.

Examples of Sexual Harassment

Examples of sexual harassment include:

- Physical acts of a sexual nature, such as:
 - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee’s body or poking another employee’s body;
- Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:



- Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments;
 - Subtle or obvious pressure for unwelcome sexual activities.
- Sexually oriented gestures, noises, remarks, or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- Sex stereotyping, which occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
 - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials, or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
 - Interfering with, destroying or damaging a person's workstation, tools, or equipment, or otherwise interfering with the individual's ability to perform the job;
 - Sabotaging an individual's work;
 - Bullying, yelling, name-calling.

Who can be a target of sexual harassment?

Sexual harassment is not limited to women. Anyone can be a target of sexual harassment, regardless of sex or gender. California Law protects employees, paid or unpaid interns, and non-employees (including independent contractors), and those employed by companies contracting to provide services in the workplace.

As for the harasser, it may be a superior, a subordinate, a coworker/peer, or anyone else in the workplace -- including an independent contractor, contract worker, vendor, client, customer, or visitor.

Where can sexual harassment occur?

Sexual harassment can occur in the workplace, but it can also occur elsewhere, such as on a business trip or at a company-sponsored event. It should be noted that sexual harassment does not always occur in face-to-face situations. Harassment can occur through calls, texts, emails, and social media usage, even if takes place away from the workplace premises, via personal devices, or during non-work hours.



Any employee who feels harassed should report it so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy. Procedures for reporting sexual harassment are discussed below under the heading “Reporting Sexual Harassment and Other Forms of Discrimination.”

Other Forms of Prohibited Discrimination

Sexual harassment is one form of discrimination, but it is by no means the only form of discrimination a worker may experience. Unlawful discrimination may be based on an individual’s actual or perceived age, race, creed, color, national origin, gender, disability, marital status, partnership status, caregiver status, sexual and reproductive health decisions, sexual orientation, uniformed service or immigration or citizenship status, religion, pregnancy, childbirth, or related condition, consumer credit history; salary history; pre-employment marijuana use; or because an employee or applicant is a victim of domestic violence, sex offenses, stalking, criminal and conviction histories, or any other status protected by law or regulation. Such discrimination may be in the form of a hostile work environment based on the protected status, exhibited through offensive words, signs, jokes, pranks, intimidation, or physical violence. Discrimination may also consist of decisions or acts that impact a term, condition, or privilege of an individual’s employment, based on or due to that individual’s protected status.

Retaliation

Retaliation is defined as any adverse employment action taken against an applicant or employee because that person engaged in activity protected under this policy or reasonably thought to be protected under this policy. Protected activities may include, but are not limited to, reporting, or assisting in reporting suspected violations of this policy and/or cooperating in investigations or proceedings arising out of a violation of this policy.

Adverse employment action is conduct or an action that materially affects the terms and conditions of the applicant’s or employee’s employment status or is reasonably likely to deter the person from engaging in protected activity. Even actions that do not result in a direct loss of compensation or in termination may be regarded as an adverse employment action when considered in the totality of the circumstances.

Addressing And Reporting Violations of this Policy

To the extent possible, SterlingRisk will endeavor to keep the reporting of the applicant or employee’s concerns confidential; however, complete confidentiality cannot be guaranteed when it interferes with SterlingRisk’s ability to fulfill its obligations under this policy or any applicable law or order. All employees are required to cooperate fully with any investigation. This includes, but is not limited to, maintaining an appropriate level of discretion regarding the investigation and disclosing any and all information that may be pertinent to the investigation.



Upon completion of the investigation, if misconduct is substantiated, SterlingRisk will take appropriate corrective and preventive action calculated to end the conduct up to and including disciplinary action where warranted.

Legal Protections and External Remedies

Employees who have been sexually harassed or subjected to other forms of discrimination have the right to pursue legal remedies with certain governmental entities or privately, outside of the agencies' processes. While a private attorney is not required to file a complaint with a governmental agency, you may seek the legal advice of an attorney.

Civil Rights Act of 1964 (Title VII)

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief, but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

An employee alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at www.eeoc.gov or via email at info@eeoc.gov.

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.



Filing Of Complaints With Other Jurisdictions

Employees and applicants may also file formal complaints of discrimination, harassment, or retaliation with the agencies listed below. Individuals who wish to pursue filing with these agencies should contact them directly to obtain further information about their processes and time limits.

CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

2218 Kausen Drive, Suite 100 Elk Grove, CA 95758

(800) 884-1684 (voice), (800) 700-2320 (TTY) or California's Relay Service at 711
contact.center@dfeh.ca.gov

www.dfeh.ca.gov

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

450 Golden Gate Avenue 5 West, P.O Box 36025 San Francisco, CA 94102 1 (800)669-4000

1 (800) 669-6820 (TTY) 1 (844) 234-5122 (ASL Video Phone)

www.eeoc.gov/Associates