

Policy: Harassment-Free Workplace (U.S.)

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Travelers is committed to creating a welcoming culture in which you feel valued, respected and supported. We are also committed to promoting a productive and respectful work environment that is free from harassment. We prohibit and will not tolerate any type of harassment based on race, color, religion, gender (including pregnancy), age, national origin, disability, marital status, sexual orientation, gender identity, veteran status, military status, genetic information or any other status or condition protected by local, state or federal law. This also applies to harassment that violates any applicable law and prohibits conduct that, while not necessarily illegal, is inconsistent with our policies.

This applies to all employees, including temporary employees, customers, vendors and guests whenever or wherever work-related functions take place.

Definition of Harassment

Harassment is visual, verbal or physical conduct that has the intent, effect or can be perceived as unreasonably interfering with work performance, or which creates an intimidating, hostile or patently offensive work environment. Harassment may be based upon a protected status, which includes race, color, religion, gender (including pregnancy), age, national origin, disability, marital status, sexual orientation, gender identity, veteran status, military status, genetic information or any other status or condition protected by local, state or federal law.

Sexual Harassment

Sexual harassment is expressly prohibited. Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, or other visual, verbal or physical conduct of a sexual nature when any of the following conditions are present:

- Submission to such conduct is made a term or condition of employment;
- Submission to or rejection of such conduct by the recipient is used as the basis for employment decisions affecting the recipient;
- The conduct unreasonably interferes with an employee's job performance; or
- The conduct creates an intimidating, hostile or patently offensive work environment.

It is unlawful for males to sexually harass females or other males, and for females to sexually harass males or other females.

Examples of Prohibited Conduct (Sexual and Other Types of Harassment), communicated or conducted in person or by any means, whether verbal, written or electronic:

- Unwelcome sexual flirtation, advances or propositions.
- Verbal comments such as derogatory comments, epithets, threats, slurs or explicit jokes.
- Explicit or degrading verbal comments about another individual's appearance.
- Use of a patently offensive or demeaning term that has a sexual connotation.
- Offensive physical proximity or physical contact, including, without limitation, touching, assault or impeding or blocking movements.
- Any indication, express or implied, that an employee's job security, job assignment, conditions of employment, or opportunities for advancement or job benefits may depend on the granting or refusal of sexual favors to any other employee or manager.
- Any action relating to an employee's job status that is, in fact, affected by consideration of the granting or refusal of sexual favors or submission to sexually offensive conduct.
- Use of company property (e.g., email, voicemail, internet services, instant messaging services, computers, mobile devices, printers, copying or fax equipment, etc.) to access, communicate, produce, disseminate, display or store material that is obscene or could otherwise create a patently offensive or hostile work environment.



- Making or threatening reprisals after a negative response to sexual advances.
- The creation of an atmosphere in which an employee's work, property or reputation is demeaned because of the employee's protected status.
- Conduct including intimidating or patently offensive gestures, leering, the dissemination or posting or communication of materials such as posters, photographs, cartoons, drawings, emails, articles or pictures that have sexual content or that denigrate persons of a protected class.
- Attendance at adult entertainment/strip clubs or similar establishments during work hours or company-sponsored events or while conducting company business.
- Retaliation for reporting harassment or threatening to report harassment.

Responsibilities

All employees are responsible for complying with this policy by maintaining and supporting a work environment free from intimidation and harassment. Toward that end, any employee who believes that he/she has become aware of an incident of harassment, whether by witnessing the incident, being told of it or experiencing it personally, must follow the guidelines to report this harassment set forth below. Similarly, managers who witness or receive information that suggests a violation of this policy (e.g., receiving inquiries or complaints or otherwise witnessing prohibited behavior) should ascertain the nature of concerns by asking preliminary questions and must immediately report the matter to the company's attention as set forth below.

Guidelines for Reporting Harassment

Employees have Travelers' support when reporting in good faith any type of potentially discriminatory remarks, unlawful harassment and threats of violence or similar unlawful conduct prohibited under this policy. If an employee believes he/she has been harassed on the job or at a work-related function, or if he/she is aware of the potential harassment of others, the employee may attempt to stop the prohibited behavior immediately on his/her own. If an employee feels comfortable doing so, the employee should advise the person engaging in the prohibited behavior that the behavior is prohibited and that the behavior should be stopped. Regardless of whether an employee confronts the individual engaging in the behavior on his/her own or if the employee is not comfortable confronting the individual engaging in the behavior, the employee must report the situation immediately by notifying his/her direct manager, another manager in their business unit, notifying their Human Resources generalist, calling Employee Relations at 860.277.7246 or calling the Ethics Helpline at 866.782.1441. Similarly, managers who witness or receive information that suggests a violation of this policy (e.g., receiving inquiries or complaints or otherwise witnessing prohibited behavior) must immediately report the matter to their Human Resources generalist or to Employee Relations at 860.277.7246.

Travelers will investigate all reported complaints of harassment or discrimination in a fair, impartial, thorough and prompt manner. The investigation will be conducted by qualified personnel and involved employees will be given an opportunity to respond and will be provided appropriate due process. The investigative process will be customized depending on the nature and circumstances of the complaint. We will maintain confidentiality surrounding the investigation to the extent possible and to the extent permitted under applicable federal and state law. Travelers will document its progress during the investigation. We will reach a reasonable conclusion based on the evidence collected and close the investigation in a timely manner.

Upon completion of the investigation, if it is determined that this policy has been violated, and that employee misconduct has occurred, remedial action will be taken, commensurate with the severity of the offense, up to and including termination of employment. This applies to employees who have engaged in this type of misconduct as well as managers who knowingly allowed such behavior to continue. Appropriate action will also be taken to deter any such conduct in the future.

Employees in California

As required by California law, Travelers strictly prohibits all forms of harassment and discrimination on the basis of race, color, national origin, ancestry, religion, sex, gender (including gender identity and gender expression), pregnancy (including childbirth or related medical conditions, and breastfeeding), sexual orientation, military status, veteran status, marital status, registered domestic partner status, age, disability, protected medical condition, genetic information or any other category protected by applicable state or federal law.



Employees in New York

Sexual harassment is not only prohibited by Travelers, but is also prohibited by state, federal and, where applicable, local law. Aside from Travelers' internal process, employees may also choose to pursue legal remedies with the following governmental entities under the following laws:

- **State Human Rights Law (HRL)** - The HRL, codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York state with regard to sexual harassment. A complaint alleging violation of the HRL may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment or redress the damage caused, including paying of monetary damages, attorney's fees and civil fines.
- **Civil Rights Act of 1964** - 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.). The EEOC will investigate the complaint and determine whether there is probable cause to believe that discrimination occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court. Federal courts may award remedies if discrimination is found to have occurred.
- **Local Protections** - Many localities enforce laws protecting individuals from sexual harassment and discrimination. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights.

To file an internal complaint, in addition to the avenues listed in "Guidelines for Reporting Harassment," employees in New York may use this [optional form](#).

Certain states require training about harassment for employees and/or managers. If you work in one of those states, you will be notified and required to complete the training during the applicable timeframe.

Anti-Retaliation

Our company expressly prohibits retaliation against employees or managers who in good faith report complaints under this policy or for assisting, testifying or participating in an investigation, proceeding or hearing related to a complaint under this policy. Further, our company will not knowingly permit retaliation to occur. Refer to the [Whistleblowing and Non-Retaliation](#) policy for more detailed information.

Contact the Employee Services Unit (ESU) via [AskESU](#) or 800.441.4378 with questions about this policy.