

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

LAST REVISED: APRIL 1, 2022

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 or expression, 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 unlawful and 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 any employee to sexually harass another, regardless of that person's gender.

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

- Unwelcome sexual flirtation, advances, or propositions.
- Derogatory comments, epithets, threats, slurs, or explicit jokes.
- Explicit or degrading 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 they have 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 they have been harassed on the job or at a work-related function, or if they are aware of the potential harassment of others, the employee may attempt to stop the prohibited behavior immediately on their own if they are comfortable doing so, including by advising the person engaging in the prohibited behavior that the behavior is prohibited and should stop immediately. Whether or not employees attempt to intervene to stop prohibited behavior, they must always immediately report conduct that they believe to be harassment or potential harassment by notifying their direct manager or another manager in their business unit, notifying their Human Resources generalist, or by calling Employee Relations at 860-277-7246 or the Ethics Helpline at 866-782-1441. 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. Travelers will maintain confidentiality surrounding the investigation to the extent possible and to the extent permitted under applicable federal and state law. Travelers will document the investigation and 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.

In addition to the Guidelines for Reporting Harassment, any employee who believes they have been harassed or discriminated against, or who is aware of harassment or discrimination against others may click [HERE](#) for additional state reporting information.

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.

Violations of this policy may result in disciplinary action, up to and including termination of employment. Contact the Employee Services Unit (ESU) via [AskESU](#) or call 800-441-4378 with questions about this policy.