

Preventing Harassment, Discrimination, and Retaliation Policy



WHY DOES IT MATTER?

Our values and principles are of little worth if they do not ultimately result in our respecting the rights and dignity of each other. Pacific Life is committed to providing a respectful and productive work environment that is free from harassment and discrimination in support of our core value, *People*. Employees who treat one another with respect, gratitude, trust, and integrity not only bolster job satisfaction but attract the employees we want to work with.

HOW DOES THIS APPLY TO ME?

Pacific Life has a strict policy against all types of workplace harassment, including sexual harassment and other forms of workplace harassment based upon an individual's race (including traits historically associated with race, such as hair texture and protective hairstyles, including braids, locks and twists), ethnicity, color, religion, gender, national origin, ancestry, age, sexual orientation, pregnancy, sex, physical or mental disability, marital status, gender identity and/or expression, genetic information, military or veteran status or any other characteristic protected by federal, state or local law. All forms of harassment of, or by, employees, applicants, vendors, visitors, and customers are strictly prohibited and will not be tolerated.

This policy prohibits **discrimination** and unlawful harassment by all employees of Pacific Life, its subsidiaries and affiliates, as well as third parties (such as vendors, customers, independent contractors, and applicants) who interact with our employees. Pacific Life also prohibits **sexual harassment** and **retaliation**.

If it has been determined that you have engaged in harassment, discrimination or retaliation in violation of this policy, you may be subject to disciplinary action even if the conduct involved does not rise to the level of a legal violation.

IT STARTS WITH ME: WHAT SHOULD I DO?

SPEAK UP:

Reporting is more than an obligation; it is an opportunity to recognize that you are not alone in dealing with troubling issues. Pacific Life has a process to help address and rectify problems in the workplace. Reporting a suspected violation in good faith allows us to implement this process.

If you believe you have experienced or witnessed harassment, discrimination and/or retaliation in violation of this policy promptly report it to your Human Resources Business Partner, Employee Relations, or Enterprise Compliance. Anonymous reporting is also available through the PL Responsibility Line.

RELATED POLICIES, PROCEDURES, FORMS, OR OTHER RESOURCES

- [Employee Handbook](#)
- [Equal Employment Opportunity Policy](#)
- [Reporting Violations, Seeking Help, and Raising Concerns Policy](#)
- [PL Responsibility Line](#)

WHAT IF I HAVE QUESTIONS OR NEED MORE INFORMATION?

Contact one of the following resources:

- [HR Business Partner](#)
- [HR Employee Relations](#)
- [Enterprise Compliance](#)

In situations where conduct may endanger the employee and/or others, immediately notify Corporate Security or any member of management on site.

COOPERATE IN THE INVESTIGATION PROCESS:

Whether you reported the violation or not, if you're asked to participate in an investigation, you must cooperate and tell the truth, as you know it.

WHAT ELSE DO I NEED TO KNOW?

EXAMPLES OF HARASSMENT

Harassing behavior that interferes with an individual's job performance or that creates an intimidating, hostile, or offensive working environment for employees, visitors, or anyone conducting business with Pacific Life will not be tolerated.

Examples Include:

- derogatory or offensive comments, slurs, or gestures
- offensive or derogatory emails, online and social media posts, text messaging or computer transmissions where the content or conduct negatively affects other employees or the **workplace**, even though the conduct itself may have taken place outside of the workplace
- circulation of inappropriate written materials, jokes, or cartoons
- negative stereotypes
- any other verbal or physical conduct that demeans, ridicules, or torments an individual based on a **protected characteristic**

EXAMPLES OF SEXUAL HARASSMENT

In addition to the types of conduct described above, engaging in unwelcome conduct of a sexual nature or making unwelcome sexual propositions or advances is strictly prohibited in the workplace.

Examples Include:

- VERBAL:** Sexual comments or references, jokes, stories, or conversation of a sexual nature.
- PHYSICAL:** Inappropriate sexual or romantic touching, offensive gestures, physical interference, or impeding or blocking movement.
- VISUAL:** Posters, cartoons, drawings, letters, poems, notes, emails, text messages, or online posts of a sexually explicit or suggestive nature.
- OTHER:** Repeated unwanted romantic advances or attention; excessive comments about someone's appearance; unwanted expressions of sexual interest, sexual advances, or requests for sexual favors; excessive or inappropriate gift giving; accessing inappropriate websites in the workplace or with Company resources.

RETALIATION

Retaliation is negative treatment or adverse action taken against an employee because he or she has reported a concern or cooperated in an investigation. Retaliation may be overt (such as demotion or termination) or subtle (giving the employee undesirable assignments, poor performance evaluations, and ostracizing the employee from the rest of the department).

Regardless of the resolution of a reported violation, you should never fear retaliation for reporting concerns in **good faith** or participating in an investigation. Any sort of retaliation that accompanies a reported violation is against Pacific Life policy and will not be tolerated.

REPORTING AND INVESTIGATION PROCESS

If a report is made, Pacific Life does not automatically assume a violation has occurred. All reports are documented and investigated carefully and timely. The resolution of the investigation depends on many factors. These factors include whether the report was substantiated, the seriousness of the matter, and the effect on Pacific Life and its employees. If misconduct is found, Pacific Life will take appropriate remedial action. Possible remedies for substantiated violations include, but are not limited to, employee counseling, verbal or written warning, and termination of employment.

Complete information about the reporting and investigation process is outlined in the [Reporting Violations, Seeking Help, and Raising Concerns Policy](#).

FEDERAL AGENCY COMPLAINT PROCEDURE

In addition to the Company's internal complaint procedure, you should also be aware that the federal Equal Employment Opportunity Commission (EEOC) and Department of Fair Employment & Housing (DFEH) investigate and, in appropriate cases, prosecute complaints of harassment, discrimination, and retaliation in employment. The EEOC and DFEH may, after a hearing, award damages to individuals actually injured as a result of such conduct, as well as other remedies. Information about the EEOC complaint procedure can be found on its website (www.eeoc.gov), or by calling 1-800-669-4000 (English), or 1-800-669-6820 (TTY). Information about the DFEH can be found on its website (www.dfeh.ca.gov), or by calling 1-800-884-1684 (English), or 1-800-700-2320 (TTY).

DEFINITIONS

- **Discrimination:** Is the prejudicial treatment of individuals based on gender, race, color, religion, national origin, ancestry, age, physical or mental disability, medical condition, marital status, military or veteran status, sexual orientation, gender identity, gender expression, or any other characteristic protected by federal or state law.
- **Good Faith:** Means that you must tell the truth, as you know it, about the situation.
- **Protected Characteristic:** Includes race, color, national origin, religion, gender, disability, age, and citizenship status.
- **Sexual Harassment:** Includes, but is not limited to, situations where:
 - o Submission to the conduct is required or implied as a term or condition of employment. For example, hiring or termination.
 - o Submission to, or rejection of, the conduct is used as the basis of employment decisions. For example, promotion, compensation, and assignments.
 - o The conduct unreasonably interferes with an individual's work performance by creating an intimidating, hostile, or offensive working environment.
- **Workplace:** For purposes of this policy workplace includes company property and offices as well as work-related social activities or events that occur outside of the office or after business hours.