
Equal Employment Opportunity and Harassment-Free Workplace Policies

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GLOBAL

These two policies update and replace any previous Equal Employment Opportunity and Harassment-Free Workplace Policy previously distributed.

EQUAL EMPLOYMENT OPPORTUNITY

Russell Reynolds Associates ("RRA") is an Equal Opportunity Employer and maintains the policy of recruiting and retaining the best qualified personnel who demonstrate the ability to perform competently and work well with others. It is the policy of RRA to provide equal employment opportunity regardless of race, color, age, religion, sex, national origin, disability, sexual orientation, gender identity, marital status, veteran status, or any other condition or status protected by law.

This policy of non-discrimination prevails throughout all aspects of the employment relationship, including recruitment, selection, placement, transfer, promotion, layoff/recall, termination, training, working conditions, benefits and compensation. In addition, we prohibit discriminatory or other offensive conduct based on legally protected status by third parties dealing with RRA, such as vendors, contractors, clients, agents and suppliers.

If you observe any violation of this policy, experience conduct that is in violation of this policy, or, if any type of accommodation is needed as a result of any condition or status protected by law, contact your Human Capital Director, the Chief Human Capital Officer ("CHCO"), or your Area/Country Manager, a member of the Legal Department or report an incident via the RRA Ethics Hotline (ethics.russellreynolds.com).

HARASSMENT-FREE WORKPLACE POLICY

RRA is committed to maintaining a professional work environment in which all individuals are treated with dignity and respect. Accordingly, RRA does not tolerate any form of discrimination, harassment, retaliation, joking remarks or other abusive conduct by or against employees, contractors, clients, candidates, vendors, or any other individuals who conduct business with RRA because of their race, color, sex, religion, national origin, age, disability, sexual orientation, marital status, gender identity, citizenship status, veteran status, or any other category protected by law, or because an individual complained of harassment or discrimination.

Harassment can include verbal or physical conduct that demeans, denigrates or shows hostility or aversion toward an individual because of his/her race, color, sex, religion, age, or disability, or any other legally protected category, and that creates an intimidating, hostile, or offensive work environment, unreasonably interferes with an individual's work performance or otherwise adversely affects an individual's employment opportunities. Sexual harassment is the most well-recognized form of unlawful harassment and may involve individuals of the same or opposite sex. Sexual harassment is verbal or physical conduct of a sexual nature that is not welcome, that is personally offensive, that debilitates morale, and that, therefore, interferes with equal employment opportunities for employees. Such conduct is specifically prohibited. This includes, but is not limited to: unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- Submission to or rejection of such conduct is used as a basis for employment decisions affecting such individual;
- or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Although not an exhaustive list, the following are examples of conduct prohibited by the RRA's Harassment-Free Workplace Policy:

- Engaging in offensive, sexual or overly-familiar touching or any other physical interference with normal work or movement;
- Requests for sexual favors;
- Continued or repeated verbal abuse of a sexual nature about an individual or his or her appearance;
- Threatening or suggesting that continued employment, advancement, assignment or earnings depend on whether the employee will submit to, or tolerate harassment;
- Viewing, displaying or circulating discriminatory or sexually explicit or suggestive materials, including without limitation: cartoons, photographs, calendars, drawings and emails;
- Jokes, pranks or other humor that is demeaning or hostile with regard to race, color, religion, gender, sex, national origin, sexual orientation, gender identity, age, handicap or disability;
- Epithets, slurs, quips or negative stereotyping that relate to race, color, religion, gender, sex, national origin, citizenship, age, sexual orientation, gender identity, physical or learning disability, marital status, veteran status, political beliefs or any other basis prohibited by law;
- Threatening, intimidating or hostile acts that relate to race, color, religion, gender, sex, national origin, sexual orientation, gender identity, age, handicap or disability;
- Written or graphic material (including graffiti) that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, sex, national origin, sexual orientation, gender identity, age, handicap or disability and that is placed on walls, bulletin boards, computers or elsewhere on the RRA's premises, or circulated or displayed in the workplace; or
- Actions that create an intimidating, hostile or offensive work environment.

Conduct prohibited by this policy is unacceptable whether in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

ANTI-RETALIATION POLICY

Retaliation, which can include harassing behavior, is an adverse action one takes against another person because that person complained of unlawful discrimination or harassment, or otherwise engaged in legally-protected activity. RRA treats claims of retaliation as seriously as harassment itself.

Employees who report harassment or discrimination, or who participate in an investigation of alleged harassment or discrimination, are protected by RRA's policy and the law against retaliation.

The following are examples of prohibited retaliatory action:

- Threatened or actual termination of employment;
- Disciplining, writing a negative performance review, reducing or adversely changing the work assignment of, or refusing to cooperate with an employee because that employee has complained about or resisted harassment, discrimination, or retaliation; or
- Discouraging a report, falsely denying, covering up, or attempting to cover up incidents of harassment or discrimination.

WORKPLACE RELATIONSHIPS

It is RRA's intention to ensure that the work environment is free from harassment of any kind, including sexual harassment. Although RRA strongly discourages consenting intimate, romantic, dating or other similar relationships between co-workers, RRA acknowledges that such relationships may develop between a manager and his or her subordinate or another employee within that manager's direct area of responsibility or accountability. An employee is within another's "direct area of responsibility or accountability" where the latter is responsible for the former's evaluation, promotion, compensation, day-to-day supervision, or direction. RRA believes that such relationships have the potential to have an adverse effect on morale, productivity, objective personnel decision-making, and the operation of RRA's business because of real or perceived favoritism, bias, or unfair treatment. Accordingly, RRA strongly discourages such relationships. If a consenting romantic or intimate relationship between a manager and an employee within that manager's direct area of responsibility or accountability should develop, the manager must disclose such relationship to Human Capital. Human Capital, upon learning of the existence of such a relationship, may take all steps that it, in its sole discretion, deems appropriate to avoid issues of favoritism, negative impact on others in the work environment, or conflict of interest. This policy shall apply without regard to sexual orientation of the participants.

In all instances, if an employee wishes to maintain or initiate an intimate, dating, or social relationship with another firm employee, the individual seeking to commence or continue the relationship has responsibility to ensure that such relationship is welcome by the other individual and to discontinue the relationship (or any attempt to engage in a relationship) as soon as any indication is given that the relationship is not welcome.

EMPLOYMENT FOR PERSONS WITH DISABILITIES

RRA is committed to ensuring equal employment opportunity for qualified individuals with disabilities. RRA will comply with any legal obligations to provide reasonable accommodations or adjustments to qualified individuals with known disabilities. It is your responsibility to inform RRA if you feel that you are disabled or if you believe you need a reasonable accommodation to perform the essential functions of your position. If you feel that such an accommodation is needed, please talk with your Human Capital Director.

PROCEDURE FOR REPORTING HARASSMENT OR RETALIATION

Because RRA's policy is to provide a work environment free from discriminatory harassment and retaliation, you must take immediate action if you feel you are the subject of this type of harassment or retaliation from any supervisor, manager, colleague, or other person you come in contact with as an employee. To ensure that the firm is aware of the situation, any employee who believes that he or she has been subjected to harassment, retaliation, or any other violation of RRA's Equal Employment Practices should immediately report it to his or her Human Capital Director, the CHCO (212-716-7080), a member of the Legal Department, or his or her Area/Country Manager, or via the RRA Ethics Hotline (ethics.russellreynolds.com). RRA may request a written and signed record of the complaint.

All complaints will be investigated promptly. When investigating complaints, RRA will attempt to maintain confidentiality to the greatest degree possible. RRA encourages employees to report any incidents of harassment or retaliation, and it assures them that no individual will suffer retaliation or reprisal as a result of reporting a complaint in good faith. Prompt, effective remedial action will be taken where appropriate, based on the results of the investigation. Any violation of this policy, including inappropriate actions or failure to act, may result in corrective action up to and including, termination of employment.

Employees who have questions about this policy or about their responsibilities, should discuss them with a member of the Human Capital or Legal Departments, or submit a question via the RRA Ethics Hotline (ethics.russellreynolds.com).