

## DISCRIMINATION AND HARASSMENT

### I. **PURPOSE**

The purpose of this Policy is to establish Company requirements for a work environment in which all individuals are treated with respect and dignity. It is also the purpose of this Policy to establish awareness as to the definition and forms of various types of discrimination and harassment.

### II. **SCOPE**

This policy applies to all Citizens Energy Group employees, business units and 3<sup>rd</sup> party representatives.

### III. **DEFINITIONS**

Defining Discrimination - Discrimination occurs when decisions are made regarding an individual's employment, performance evaluation, compensation, advancement, assigned duties, or any other conditions of employment or career development, which disadvantage the individual, based on the group, class, or category to which that individual belongs, rather than on individual merit.

The Company ensures equal opportunity without discrimination in the workplace on the basis of gender identity or expression, race, color, religion, national origin, age, physical or mental disability, pregnancy, citizenship, status as a covered veteran, marital status, sexual orientation, sexual identity, genetic information, or any other characteristic protected by applicable laws.

Defining Harassment - Harassment is unwelcome, disturbing or offensive conduct that creates an intimidating, hostile or offensive work environment which may result in physical or psychological harm. It may take the form of written, electronic or verbal communications or physical acts. Specific examples include, but are not limited to: bullying, epithets, slurs, stereotyping, degrading or insulting jokes or comments, unwelcome physical contact, and the display or circulation in the workplace of written or graphic material that degrades an individual or group. An individual may be engaging in harassment under this Policy even if the conduct is directed at the same group to which the individual engaging in the conduct belongs.

Defining Sexual Harassment - Sexual harassment includes, but is not limited to: Unwelcome sexual advances, requests for sexual favors, unwanted physical contact, including touching, patting, pinching, etc., unwelcome comments of a sexual or demeaning nature, the display of sexually offensive posters, pictures or objects. Any use of an employee's submission to, or rejection of, the conduct described above as the basis for employment decisions affecting the employee (such as hiring, firing, promotions, compensation or working conditions). Any explicit or implicit implication that submission to such behavior is a term or condition of an individual's employment.

The Company ensures a workplace where individuals are treated fairly and with respect; are not subjected to unwelcome conduct, including disturbing or offensive behavior and language; and are not subject to an intimidating, hostile or offensive work environment, resulting from conduct that is based on any characteristic protected by applicable laws.

### IV. **POLICY**

Each individual has the right to work in a professional atmosphere that promotes equal opportunity and prohibits discrimination and harassment. Therefore, the Company expects that all relationships among persons in the workplace will be business-like and free of harassment, bias, prejudice and discrimination.

The Company prohibits discrimination and harassment, whether engaged in by fellow employees; a supervisor, manager or individuals they supervise or manage; or a third party who does business with the Company (e.g., an outside vendor, consultant or customer).

Conduct prohibited by this Policy is unacceptable in the workplace, on company property, and in any work-related setting outside the workplace, such as during business trips, meetings and business-related social events. All employees are expected to refrain from discrimination and harassment of others.

## V. PROCEDURE

### Reporting Harassment or Discrimination

Any person who believes that he or she has been the victim of some form of workplace harassment or discrimination from a fellow employee or from a non-employee (outside vendor, consultant or customer etc.) should report the incident immediately to his/her supervisor and/or directly to Human Resources or submit a report anonymously by accessing the MyWorkplace hotline at 1-800- 461-9330 or at [www.citizensenergygroup.com/myworkplace](http://www.citizensenergygroup.com/myworkplace). Complaints involving alleged misconduct by an individual's supervisor should be made to the next higher level of supervision and/or to Human Resources. Supervisors who receive complaints of harassment or discrimination will immediately report the complaint to Human Resources.

### Complaint Investigation

Persons submitting complaints of harassment or discrimination are assured that a thorough investigation of such complaint will be conducted at the direction of Human Resources. The contents of the complaint will be kept confidential to the extent possible and consistent with the need to conduct a thorough investigation. Information collected during such an investigation will be considered confidential and will not be disclosed to persons not involved in the investigation or in determining what action, if any, to take in response to the complaint.

### Disciplinary Action

If, following a complaint of harassment or discrimination, an investigation reveals that inappropriate behavior has occurred; the person who has violated this policy will be subject to appropriate disciplinary action up to and including termination.

Consult with the Vice President of Human Resources and the Director of Human Resources and make a recommendation as to the appropriate action to be taken.

### Retaliation

The Company prohibits retaliation against any individual who, in good faith, reports discrimination or harassment or participates in an investigation of such reports. Retaliation is a serious violation of this policy, and, like harassment or discrimination itself, will be subject to disciplinary action up to and including termination.

Primary Business Unit Owner: Director of Human Resources

Last Review Date: March 10, 2023

Next Review: 2026

Supersedes: Policy Release #1002, Effective August 13, 2018

Reference: Discrimination; Harassment; Sexual Harassment

*"Citizens Energy Group at its option reserves the right to change, delete, suspend, or discontinue parts of the policy in its entirety, at any time without prior notice."*