



## **Discrimination and Harassment-Free Workplace Policy**

**Applicability:** All employees of Semptra and the Semptra Companies

### **Policy**

Semptra and the Semptra Companies are committed to providing a respectful workplace that is free of discrimination, harassment, bullying, and retaliation. Semptra and the Semptra Companies provide equal opportunity and foster a diverse workforce and a culture of inclusion.

### **Commitment to Diversity and Inclusion**

Semptra and the Semptra Companies' strong commitment to diversity starts at the top. Appreciation for the diversity of our workforce is part of who we are as a family of companies and is important to how we do business. Understanding the value of diversity and practicing inclusion allows us to draw on resources, internal and external, that translate into a richer variety of approaches to problem solving and enhanced business prospects. Appreciation for diversity and inclusion also helps ensure that employees are able to reach their full potential and contribute to our companies' success.

*Our vision is to celebrate diversity and create a culture of inclusion. By learning about those around us, we can better respond to the needs of our employees and customers. This leads to more engaged employees and stronger connections with our communities. When we show respect for one another and treat everyone fairly, we develop trust. The workplace becomes a vibrant place where unique perspectives yield innovative ideas that can lead to stronger business results.*

(Excerpt from the Employee Diversity & Inclusion Committee's Definition of Diversity and Inclusion.)



## **Harassment and Discrimination**

Semptra and the Semptra Companies do not tolerate the harassment, including sexual harassment, of any applicant, employee (including coworker, supervisors and managers), temporary worker, non-employee resource, or other third party, customer, or supplier. Generally, harassment is unwelcome verbal or nonverbal physical or visual contact or conduct that creates an intimidating, offensive, or hostile working environment or that unreasonably interferes with job performance.

Harassment for any discriminatory reason, such as race, color, national origin, ancestry, citizenship, religious creed, physical or mental disability including HIV and AIDS, cancer, genetic characteristics, marital status, sex, sexual orientation, gender identity or expression, age, pregnancy, childbirth, or related medical conditions, family and medical care leave, military status, or political affiliation, is prohibited and illegal. Harassment includes many forms of offensive behavior and includes harassment of a person of the same protected class as the harasser.

Examples of harassment may include, but are not limited to:

- Sexual, racial, or ethnic slurs, jokes, comments, innuendoes, propositions, threats, or similar verbal behavior or verbal abuse based on any protected characteristic or category
- Prolonged or repeated staring that a reasonable person would find uncomfortable
- Offering employment benefits in exchange for sexual favors or making or threatening reprisals after a negative response to sexual advances
- Graphic verbal commentaries about an individual's body, sexually or racially degrading words used to describe an individual, or suggestive or obscene letters, notes, or invitations
- Displaying or sharing sexually oriented pictures, derogatory posters, cartoons, drawings, suggestive objects, or other similar items based on any protected characteristic
- Unwanted touching, interference with an individual's normal work movements, or assault
- Bullying or cyberbullying behaviors, such as repeated unwelcome teasing, starting or perpetuating false rumors, sending hurtful, harassing, or threatening messages through email, text, or social media, impersonating someone online to harass or hurt another person, or spreading an unflattering or sexually suggestive picture of another person online

In addition, Semptra and the Semptra Companies do not tolerate unlawful discrimination



and actively support the anti-discrimination laws and regulations everywhere we conduct business. Examples of discrimination may include, but are not limited to:

- An employee is denied a promotion because the employee's supervisor believes it will interfere with the employee's family obligations
- A qualified applicant in a wheelchair is not hired without consideration of whether the position could be modified
- An employee with a foreign accent is excluded from projects that would give them more visibility
- A minority applicant is hired over a more qualified minority applicant because they have a lighter complexion
- An employee is denied a promotion or given a low performance review due to gender identity, transformation or expression
- An employee is denied the ability to take prayer breaks without consideration of whether an accommodation could be provided
- An employee is denied a promotion or other opportunity due to their age

## **Responsibility and Accountability**

This policy applies to all employees at all levels, at all times. Sempra and the Sempra Companies expect that all employees will:

- Read, understand, and support this policy,
- Ensure their actions contribute to an environment in which everyone is treated with respect and dignity,
- Promptly report any incidents of workplace discrimination or harassment, and
- Avoid bystander behavior by:
  - Not encouraging or supporting inappropriate behavior (make it clear you will not be involved)
  - Directly intervening (say the conduct is unacceptable; defend the victim)
  - Reporting misconduct (do not assume that others will speak up or report an incident)
  - Approaching the victim (acknowledge the behavior is unacceptable; encourage them to seek help)

Supervisory employees will be held accountable for:

- Preventing discrimination and harassment,
- Ensuring that employees are aware of the policy through training and/or policy review,
- Identifying potential concerns,



- Taking prompt and effective corrective action,
- Promptly reporting concerns whenever warranted, and
- Refraining from and preventing retaliation.

Disciplinary action, up to and including termination, will be taken against any employee who engages in behavior that violates this policy.

### **Internal Complaint Reporting**

Employees should report incidents of discrimination or harassment in the following order, to:

- Their supervisor, manager, or director,
- Human Resources Department,
- Diversity & Inclusion Department,
- Sempra's Chief Ethics Officer ([Ethics@sempra.com](mailto:Ethics@sempra.com)), or
- Sempra's anonymous Ethics Helpline

Employees can report incidents online at [www.SemptraEthics.com](http://www.SemptraEthics.com), or call using the below telephone numbers:

- United States: 800-793-7723
- Mexico: 001-770-582-5249

If the incident involves the employee's supervisor, a report may be made to any other resources on this list.

Raising a concern with a member of management is the same as raising a concern with Sempra or the Sempra Companies (through Human Resources Department, Diversity & Inclusion Department, or the Helpline). Accordingly, all such concerns must be investigated, and no member of management should promise an employee that the employee's concerns will not be disclosed. To the extent possible in investigations, concerns can be raised anonymously. Sempra and the Sempra Companies will take appropriate corrective action in response to complaints brought to its attention, and any such complaints will be addressed through a fair, timely, and thorough investigation.

### **No Retaliation**

As outlined in the Ethics & Compliance – Reporting and Investigating Concerns Policy, Sempra and the Sempra Companies will not tolerate any form of retaliation against



anyone who reports in good faith a possible incident of harassment or discrimination or cooperates in the investigation of such complaints.

Possible acts of retaliation can include:

- Reprimanding the employee or providing a performance evaluation that is less favorable than it should be
- Transferring the employee to a position with lower compensation or significantly reducing responsibilities
- Engaging in verbal or physical abuse
- Threatening to make or actually making reports to authorities, such as reporting immigration status
- Increasing scrutiny of the employee
- Spreading false rumors
- Sabotaging the employee's ability to perform their job, such as withholding information or omitting the employee from critical meetings

Disciplinary action, up to and including termination, will be taken against any employee who engages in retaliation.

## Other Resources

Employees who believe they have been subjected to illegal harassment or discrimination may also file a complaint with the Equal Employment Opportunity Commission (at 800-669-4000) or the equivalent state agency. \*Employees who are found to have suffered harassment or discrimination may be entitled to fines or damages, hiring or reinstatement, back pay or promotion, and injunctive relief.

State	State Agency*	Telephone Number
California	California Department of Fair Employment and Housing	800-884-1684
Louisiana	Louisiana Commission on Human Rights	225-342-6969
Texas	Texas Workforce Commission, Civil Rights Division	888-452-4778

\*States in which Semptra or the Semptra Companies do business that are not listed here have no equivalent state agency.

*\*Note: All references to "Semptra Company/Company" in this document mean a subsidiary or other entity as to which Semptra has majority ownership and control.*