

# Nondiscrimination and Anti-Harassment

## I. Purpose

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This policy establishes National Geographic Society's (Society) prohibition against workplace harassment and discrimination and provides procedures for reporting conduct that violates this policy.

## II. Policy Statement

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The Society is proud of its professional and congenial work environment, and will take necessary steps to ensure that the environment is a productive one that complies with all applicable laws. The Society prohibits discrimination against and harassment of any employee, applicant, contractor, or other third party. All individuals working for or on behalf of the Society must treat each other with respect and avoid discriminatory, offensive, or demeaning behavior.

Discrimination and harassment may subject both the Society and the person responsible to liability. NGS has zero tolerance for policy violations confirmed as a result of an internal investigation, and will take action appropriate under the circumstances to address such violations, up to and including termination of employment or business relationship (for third parties). The zero tolerance policy applies to both illegal harassment and discrimination as well as behavior that, while not illegal, conflicts with a productive, professional work environment.

## III. Applicability/Scope

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This policy applies to all employees, contractors and any others acting on behalf of the Society and any of its U.S. or non-U.S. subsidiaries.

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

This policy should be used in conjunction with the Code of Ethics and the Problem Resolution and Employment policies.

## IV. Definitions

NA

## V. Procedure

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### A. Discrimination

Discrimination is treating others unfairly on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, or any characteristic protected by law.

## **B. Sexual Harassment**

Sexual harassment is unwelcome conduct of a sexual nature that is sufficiently persistent or offensive to unreasonably interfere with an employee's job performance or create an intimidating, hostile or offensive working environment. It is further defined to include unwelcome sexual advances, requests for sexual favors, or any other verbal or physical (including visual) conduct of a sexual nature when:

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

## **C. Other Harassment**

Other types of harassment include verbal or physical (including visual) conduct related to other protected factors (including race, national origin, disability, age, religion, sexual orientation, gender identity, color, personal appearance, marital status, political affiliation or other discriminatory factors) that has the purpose or effect of unreasonably interfering with a person's work performance or creating an environment that is intimidating, hostile, or offensive, or that otherwise adversely affects a person's employment opportunities.

Examples of prohibited conduct include:

- Verbal: sexual innuendos, racial or sexual epithets, derogatory slurs, off-color jokes, propositions, threats, or suggestive or insulting sounds.
- Visual: derogatory posters, cartoons, or drawings; suggestive objects or pictures; graphic commentaries; leering or obscene gestures.
- Physical: unwanted physical contact, including touching, interference with a person's normal work movement, or assault.
- Other: making or threatening reprisals as a result of a negative response to an unwelcome sexual advance or other prohibited conduct; taking any employment-related action (such as hiring, firing, promoting, or demoting) with respect to any employee on the basis of the discriminatory factors described above.
- Other: engaging in partisan political activities during an employee's work time.

## **D. Complaints of Discrimination or Harassment**

The Society is committed to preventing discriminatory, harassing and other inappropriate conduct, promptly investigating complaints of inappropriate conduct, and remedying violations of this policy.

1. Employees who believe that they have been or may be subjected to prohibited conduct, should report it immediately to their manager, to appropriate higher level management, or to Human Resources. Report may also be made through the Society's independent, third party Ethics Helpline. Employees are strongly encouraged to report possible harassment before the conduct becomes severe or pervasive.

2. All employees in this organization have a duty to report discriminatory, harassing and other inappropriate conduct. Refer to the Problem Resolution policy for details on reporting concerns.

3. Complaints are handled confidentially to the fullest extent possible consistent with the need to resolve the problem, including conducting a thorough investigation. If an investigation confirms a violation of this

policy, the Society will take appropriate disciplinary or corrective action to rectify the conduct and prevent a recurrence.

4. All persons involved in an investigation are required to keep information about the investigation confidential to protect the integrity of the investigation and may not discuss the matter with others within or outside the organization unless directed by Human Resources or Legal & Business Affairs.

5. Under no circumstances will the Society tolerate any retaliation against a person for making a complaint in good faith or participating in an investigation under this policy.

#### **E. Responsibility of Managers and Supervisors**

1. Managers and supervisors must deal expeditiously and fairly with allegations of discrimination, harassment or other inappropriate behavior within their departments whether or not there has been a written or formal complaint. They must:

a. Take all complaints or concerns of alleged or possible harassment or discrimination seriously no matter how minor or who is involved.

b. Not allow an inappropriate situation to continue by not reporting it.

c. Ensure that harassment or inappropriate sexually oriented conduct is immediately reported to Human Resources for appropriate guidance and direction.

d. Do not discuss the situation with any other person, including managers, supervisors, or subordinates unless directed by Human Resources or Legal & Business Affairs.

e. Take any appropriate action to prevent retaliation or prohibited conduct from recurring during and after any investigations or complaints.

2. Managers and supervisors who knowingly allow or tolerate harassment, inappropriate behavior or retaliation, including the failure to immediately report such misconduct to Human Resources or the independent Ethics Helpline, are in violation of this policy and subject to discipline.

#### **F. Training**

Employees are required to take nondiscrimination and anti-harassment training on a schedule to be determined by Human Resources.