

# NBCUniversal

## PROVIDING A RESPECTFUL WORKING ENVIRONMENT

### TV Production - Ontario

One of our core values at NBCUniversal is doing the right thing and treating people the right way. Living up to that standard requires everyone – co-workers, job applicants, clients, freelancers, contractors and other business partners – to be treated with dignity and respect. By embracing our differences, we foster a creative and collaborative environment where everyone is able to do their best work. In support of our core values, the Company prohibits discrimination, harassment, bullying, and retaliation in the workplace or in work-related settings.

#### **EQUAL EMPLOYMENT OPPORTUNITY**

The Company is committed to making employment decisions – such as hiring, promotions, compensation, work assignments, training opportunities, and corrective action or discipline – based on merit, qualifications, business needs, and other job-related criteria, without regard to race, color, religion, creed, ethnicity, national origin or ancestry, citizenship or immigration status, sex (including pregnancy), sexual orientation, gender and gender identity or expression (including transgender status for those who are transitioning or have transitioned), family and marital status, age, mental or physical disability, genetic information, military and veteran status, or any other characteristic applicable law protects (“protected characteristics”). The Company prohibits discrimination against applicants and employees based on any of these protected characteristics. Similarly, discrimination based on the perception that an applicant or employee has a protected characteristic or associates with someone who has or is perceived to have a protected characteristic violates this policy.

#### **REASONABLE ACCOMMODATIONS**

The Company is committed to equal employment opportunities for qualified individuals with a known disability. The Company also provides reasonable accommodations in employment where accommodation based on other protected grounds is required by applicable law. The Company provides and is ready and willing to discuss reasonable accommodations for any such individuals to allow for the performance of the essential functions of their jobs.

What constitutes a reasonable accommodation may depend on many factors including, but not limited to, the nature of the individual’s disability and the essential functions of the position. Any questions about reasonable accommodation can be directed to HR representatives.

#### **HARASSMENT PROHIBITED**

##### **General Concepts**

***What is it?*** Harassment based on a protected characteristic is a type of discrimination. It includes conduct that creates a disrespectful, intimidating, hostile, degrading, or offensive work environment for another individual based on one or more of the protected characteristics listed above. This type of mistreatment, when directed at someone who is perceived to have or who associates with someone having a protected characteristic, also may be harassment. Harassment also includes any course of vexatious comment or conduct against an employee that is known or ought reasonably known to be unwelcome. This bullying does not have to be based on a protected characteristic. Each individual has the right to work in an environment free of unlawful harassment including, but

not limited to, sexual harassment. Because our goal is to provide an inclusive work environment for everyone, conduct that does not qualify as unlawful harassment may still violate this policy.

**Who is covered?** The Company will not tolerate harassment of its employees or job applicants by other NBCUniversal employees or by non-employees (such as contingent workers, freelancers, contractors, vendors and guests). Similarly, the Company will not tolerate harassment of non-employees by NBCUniversal employees.

**When/where does the policy apply?** This policy applies to conduct at work and in work-related settings, whether on Company premises or off-site, and whether during or outside of regular work hours. This includes during work-related travel, on production locations, during social events with colleagues (including vendors or other business partners), and on social media sites.

**Examples:** Harassment can take many forms. It can be verbal, physical or environmental. Identifying what is harassment involves reviewing the specific situation, but the following examples illustrate some of the types of conduct that may violate this policy:

- Derogatory, ridiculing, or demeaning comments;
- Jokes that reference a protected characteristic;
- Slurs or name-calling;
- Reliance on or expression of stereotypes;
- Non-verbal behavior, such as staring at someone in an intimidating fashion or making inappropriate gestures;
- Express or implied threats;
- Destruction or defacement of an individual's property or workspace;
- Use of one's physical stature or presence to intimidate or interfere with others;
- Use of one's perceived stature or position within the Company to intimidate others;
- Excluding others or making them feel unwelcome;
- Displaying or sharing offensive images;
- Offensive or unwelcome comments about appearance or personal or physical characteristics; and
- Inappropriate touching or other physical contact.

This list is intended to give examples and is not exhaustive. Other types of conduct may constitute harassment under this policy or applicable law.

**Applicable Standards:** These types of behavior can violate policy even if done in a joking manner and even if no intention to offend exists. Similarly, being under the influence of alcohol or other substances does not excuse behavior that violates this policy. The Company expects its leaders to set an example for others and thus should be aware of their heightened responsibilities to behave appropriately.

## **Sexual Harassment**

**Types:** Sexual harassment falls into two categories:

- Requesting or requiring sexual favors or romantic acts or attention as the basis for an employment decision or in exchange for favorable working conditions or other benefits (often called "quid pro quo" harassment), or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the employee and where the person knows or ought reasonably to know that the solicitation or advance is unwelcome; or

- A course of vexatious comment or conduct that has the purpose or effect of unreasonably interfering with an employee's work performance or of creating an intimidating, hostile, or offensive working environment due to or based on sex, sexual orientation, gender identity or expression (often called "hostile work environment" harassment).

Sexual harassment can occur regardless of the gender or sexual orientation of the individuals involved and between members of the same or opposite sex, and it does not necessarily have to be motivated by sexual or romantic desire. An individual can be a victim of sexual harassment even if he or she is not personally a target of the harassing behavior.

**Examples:** Sexual harassment can take the same forms as other types of harassment described above, but also may include:

- Unwelcome sexual or romantic advances or invitations;
- Unwelcome non-verbal conduct of a sexual nature, such as leering or making sexually suggestive gestures;
- Unnecessary or unwelcome physical contact, such as touching, massaging or kissing;
- Threats or demands that a person consent to sexual or romantic requests as a condition of employment, to avoid some work-related disadvantage or to obtain an employment benefit or advantage;
- Sharing or displaying explicit or sexually suggestive objects, images, or other materials anywhere in the workplace, including on a computer;
- Sexually suggestive jokes, derogatory or sexually degrading comments; or
- Comments about an individual's body or appearance.

This list also is intended to give examples and is not exhaustive. Other types of conduct may constitute sexual harassment under this policy or applicable law.

**Workplace Relationships:** The Company recognizes that consensual romantic or sexual relationships may exist or develop between employees and does not prohibit them. However, perceived or actual conflicts can arise both during the relationship and after it comes to an end. This risk is greater when the relationship involves a supervisor and a subordinate, no matter how many levels separate them, or when one of the employees can influence or determine the other's working conditions, regardless of whether they work in the same department. In these situations, the employee with greater authority or influence must report the relationship when it begins to Human Resources, and the other employee is encouraged to report the relationship as well.

Employees in romantic or sexual relationships that do not involve a disparity in authority or influence are encouraged to tell Human Resources when such a relationship develops, particularly if they work together. While the Company respects the privacy of its employees, knowing about the relationship allows it to assist in navigating any potential workplace issues that may arise.

Once a relationship is brought to the Company's attention, it will work with the employees to address any potential issues, including any actual or perceived conflict of interest. In these circumstances, the Company may change reporting relationships, transfer one or both of the employees to another position, or take other steps designed to address the situation.

## **BULLYING PROHIBITED**

Bullying is a form of harassment that undermines the respectful work environment that the Company values. Bullying occurs when an individual engages in a course of vexatious comments or conduct such as behaving in an intimidating, hostile, or abusive manner toward another, regardless of whether it is based on that person's membership in a protected category. While bullying generally involves a pattern of behavior, a single act that is sufficiently severe may still violate this policy. Like harassment, bullying may be verbal, physical or environmental. It is important to distinguish bullying from workplace supervision – such as giving performance feedback, setting and adhering to business or other performance objectives, or counseling for poor performance – which, when conducted in an appropriate manner, does not violate this policy.

## **COMPLAINT PROCEDURE**

### **Raising a Concern**

Any individual who believes he or she has observed, heard of, or been the subject of a violation of this policy should report his or her concern to the Company as soon as possible.

You may contact any of the following:

- Your Human Resources representative (see attached sheet)
- Your immediate supervisor, or another senior manager
- Comcast NBCUniversal Listens Helpline or Web Portal:
  - Tel: 877-40-LISTENS (877-405-4783)
  - Web: [www.ComcastNBCUniversalListens.com](http://www.ComcastNBCUniversalListens.com)
- Tricia Wencelblat, VP Fair Employment Practice (212-664-6551)
- Susanna Zwerling, VP Compliance (212-413-6079)
- Monica Mafud Ohara, Compliance Director, U.S. Spanish-language contact (786-585-8394)

Employees have the option report a complaint to the Comcast NBCUniversal Listens Helpline or Web Portal. An individual is not required or expected to raise a concern to the supervisor or other employee who has engaged in the discriminatory, harassing, retaliatory, or bullying behavior. Employees are encouraged to bring forward any concerns they may have about a potential violation of this policy in order to allow the Company to perform a prompt and thorough investigation and to promote its efforts to ensure that others have a respectful working environment.

### **Supervisor and Non-Supervisor Responsibilities**

Supervisors (individuals to whom at least one other employee reports) are expected to lead by example and to ensure that the individuals they manage comply with this policy. A supervisor who witnesses an interaction that may violate this policy, who otherwise suspects or becomes aware that the policy may have been violated, or who receives a concern about potential discrimination or harassment, **must** report it as soon as possible through one of the channels listed above. This obligation exists even if no complaint is made, the conduct is not directly reported to the supervisor, or an individual who raises a concern requests or insists that the matter not be reported.

The Company encourages all non-supervisors to raise situations they see or hear about that may violate the policy, even if they are not directly involved or affected. Keep in mind that everyone can play a role in promoting a

respectful working environment. Without receiving reports about potential concerns, the Company may be unable to take appropriate action.

## **RETALIATION PROHIBITED**

The Company strictly prohibits retaliation against any individual who, in good faith, raises a concern (internally or to an appropriate government agency or tribunal) about, or otherwise opposes, discrimination, harassment, retaliation, or other behavior this policy prohibits, even if the concern proves to be unfounded or the investigation is inconclusive. The Company will not tolerate retaliation against any individual who participates in good faith in the handling or investigation of a concern conducted by the Company or an appropriate government agency or tribunal. The Company also prohibits retaliation against an individual who requests an accommodation in good faith.

Prohibited retaliation includes threats of discharge, demotion, suspension or other adverse employment action, or other harassment or intimidation as a result of reporting a concern or participating in an investigation as described above.

Any concern that an employee has experienced retaliation should be reported as described in the complaint procedure above. The Company takes all complaints of retaliation seriously and investigates them promptly and thoroughly. Any employee who engages in retaliatory conduct is subject to disciplinary action, up to and including termination of employment.

## **INVESTIGATIONS OF VIOLATION OF THIS POLICY**

The Company promptly and thoroughly investigates concerns raised regarding potential discrimination, harassment, abusive behavior and retaliation. The purpose of the investigation is to consider the facts and circumstances surrounding the complaint, to determine whether a policy violation occurred, and if so, to take appropriate disciplinary and corrective action.

While each investigation is different, the investigator typically will attempt to interview both the individual who raises the concern and any individual accused of wrongdoing. Others also may be contacted if, for example, they may have information or materials that could help the investigator reach a conclusion. Employees are required to participate when called upon, and they must be open, honest, and complete in their responses to any questions from an investigator. Written notes may be taken, but an actual recording of the meeting is not permitted. If, after an interview, an employee remembers additional details that might assist the investigator, the employee should contact the investigator to provide that information. Employees will be treated professionally and with respect throughout the process.

While the Company cannot guarantee absolute confidentiality regarding an investigation of reported concerns, those Company representatives who are involved will keep it confidential to the extent possible, consistent with the need to conduct a thorough investigation and, as appropriate, resolve the concern or as otherwise required by law. Individuals who participate in or are interviewed as part of an investigation will be asked to keep the subject confidential as well, and are expected to follow such requests. Confidentiality is often important to protect the integrity of the investigation, to ensure fairness to everyone involved, and to protect the privacy of individuals who have brought forward concerns to the extent possible. Nothing in this policy is intended or should be read to limit employees' rights under applicable law to discuss work-related matters.

Consistent with the effort to maintain confidentiality, ensure fairness, and avoid retaliation, the investigator may not be able to answer certain questions about the investigation or share details about the conclusions the Company draws.

An investigation may result in any of a wide variety of outcomes. Where the Company determines that no violation occurred or the investigation is inconclusive, no action may be taken. Where, on the other hand, the Company finds a violation of policy, it will decide what response is appropriate in order to address and/or remedy the inappropriate behavior. Examples of corrective actions that may be taken against offenders include training or coaching, counseling, financial consequences (such as reduced merit increases or lower bonus payments), verbal or written warnings, suspension, and termination of employment.

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