

## **Equal Employment Opportunity and Policy Against Discrimination and Harassment (U.S.)**

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Information contained herein is for internal use and may be used only for business purposes authorized by Broadridge.

Broadridge provides equal employment opportunities to all associates and applicants for employment without regard to race, color, religion, sex (including sexual orientation, gender identity or expression and pregnancy), marital status, national origin, ethnic origin, social origin, age, disability, genetic information, or military or veteran status and other protected characteristics in accordance with applicable federal, state and local laws. This Policy applies to all terms and conditions of employment including, but not limited to, hiring, placement, promotion, termination, transfer, leaves of absence, compensation and training.

Broadridge does not tolerate unlawful harassment of associates based on race, color, religion, sex (including sexual orientation, gender identity or expression and pregnancy), marital status, national origin, ethnic origin, social origin, age, disability, genetic information, or military or veteran status or in any other group protected by federal, state or local law. Improper interference with the ability of Broadridge's associates to perform their expected job duties is not acceptable.

Associates who believe they have been discriminated against or otherwise treated unfairly in violation of this Policy should promptly utilize the complaint procedure set forth below.

California-based associates should see Appendix C for additional information.

### **Policy Against Sexual Harassment**

With respect to sexual harassment, Broadridge prohibits the following:

1. Unwelcome sexual advances; requests for sexual favors; and all other verbal and physical conduct of a sexual or otherwise offensive nature, especially where:
  - Submission to such conduct is made explicitly or implicitly a term or condition of employment;
  - Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment;
  - Such conduct has the purpose or effect of creating an intimidating, hostile or offensive working environment.
  
2. Offensive comments, jokes, innuendos, and other sexually-oriented statements. Examples of such conduct include, but are not limited to, the following:
  - Offensive or sexually-suggestive touching.
  - Grabbing, groping, kissing, fondling.
  - Violating someone's "personal space".
  - Lewd, off color, sexually-oriented comments or jokes.
  - Foul or obscene language.
  - Leering, staring stalking.
  - Suggestive or sexually-explicit posters, calendars, photographs, graffiti, or cartoons.

- Sexually offensive e-mail, voicemail messages, text-messages, or other messages sent via electronic equipment, regardless of whether such equipment was provided by Broadridge.
- Sexually-oriented or explicit remarks, including written or oral references to sexual conduct, gossip regarding one's sex life, body, sexual activities, deficiencies or prowess.
- Questions about one's sex life or experiences.
- Repeated requests for dates.
- Sexual favors in return for employment requests or threats if sexual favors are not provided.
- Any other conduct deemed sexually inappropriate by Broadridge.

Associates who believe they have been subjected to harassing conduct are encouraged to promptly advise the offender that their behavior is unwelcome, and request that such conduct be stopped. However, associates are not required to do so. Associates who feel, for any reason, that it would be inappropriate to discuss the matter with the offending person should promptly utilize the complaint procedure set forth below.

*New York-based associates should see Appendix A for additional information about sexual harassment.*

*California-based associates should see Appendix C for additional information about sexual harassment.*

*Connecticut-based associates should see Appendix D for additional information about sexual harassment.*

*Massachusetts-based associates should see Appendix E for additional information about sexual harassment.*

*Illinois-based associates should see Appendix F for additional information about sexual harassment.*

### **Complaint Procedure - Harassment or Discrimination**

Broadridge is committed to investigating and eradicating any form of harassment or discrimination including, but not limited to, sexual harassment, retaliation, or any other conduct which is prohibited by Broadridge's Anti-Harassment/Anti-Discrimination Policy. To further that end, Broadridge has adopted the following procedure for making complaints about prohibited conduct.

If you experience any job-related harassment based on your race, color, religion, sex, national origin, age, disability, genetic information, military or veteran status, sexual orientation, gender identity or expression, or status in any group protected by federal, state or local law, or believe you have been treated in an unlawful, discriminatory manner, promptly report the incident to your supervisor, department or division head, or the Human Resources Department. This policy applies to all incidents of alleged harassment, including those which occur off-premises, or off-hours, where the alleged offender is a supervisor, co-worker, or even a non-employee with whom the employee is involved, directly or indirectly, in a business or potential business relationship, or with whom the employee otherwise comes into contact as part of their employment with Broadridge.

Please be advised that nothing in this policy prohibits associates from directly confronting the alleged harasser and asking them to stop the offending behavior. This policy does not, however, require any employee to do so.

Please understand that Broadridge takes complaints of discrimination and harassment very seriously. Thus, you may bypass anyone in your direct chain of command and file your complaint or discuss or express any issue of concern with Human Resources at any time. Broadridge's Human Resources Department will undertake an investigation of any complaints.

If Broadridge determines that an employee is guilty of harassing another individual, appropriate disciplinary action will be taken against the offending employee up to and including termination of employment.

Broadridge prohibits any form of retaliation against any employee for filing a bona fide complaint under this policy or for assisting in a complaint investigation. However if, after investigating any complaint of harassment or unlawful discrimination, Broadridge determines that the complaint is not bona fide and was not made in good faith or that an employee has provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the complaint or who gave the false information.

New York-based associates should see Appendix B for a complaint form to use when raising concerns *about sexual harassment*.

*California-based associates should see Appendix C for additional information regarding raising concerns about sexual harassment.*

*Connecticut-based associates should see Appendix D for additional information regarding raising concerns about sexual harassment.*

*Massachusetts-based associates should see Appendix E for additional information regarding raising concerns about sexual harassment.*

*Illinois-based associates should see Appendix F for additional information regarding raising concerns about sexual harassment.*

Last Updated: June 2022

## APPENDIX A

### New York Sexual Harassment Policy Supplement

#### Introduction

Broadridge is committed to maintaining a workplace free from sexual harassment. Sexual harassment is a form of workplace discrimination. All associates are required to work in a manner that prevents sexual harassment in the workplace. This Policy is one component of Broadridge's commitment to a discrimination-free work environment. Sexual harassment is against the law<sup>[footnoteRef:1]</sup> and all associates have a legal right to a workplace free from sexual harassment and associates are urged to report sexual harassment by filing a complaint internally with Broadridge. Associates can also file a complaint with a government agency or in court under federal, state or local anti-discrimination laws. [1: While this policy specifically addresses sexual harassment, harassment because of and discrimination against persons of all protected classes is prohibited. In New York State, such classes include age, race, creed, color, national origin, sexual orientation, military status, sex, disability, marital status, domestic violence victim status, gender identity and criminal history. ]

#### Policy

1. Broadridge's policy applies to all associates, applicants for employment, interns, whether paid or unpaid, contractors and persons conducting business, regardless of immigration status, with Broadridge. In the remainder of this document, the term "associates" refers to this collective group.
2. Sexual harassment will not be tolerated. Any employee or individual covered by this policy who engages in sexual harassment or retaliation will be subject to remedial and/or disciplinary action (e.g., counseling, suspension, termination).
3. Retaliation Prohibition: No person covered by this Policy shall be subject to adverse action because the employee reports an incident of sexual harassment, provides information, or otherwise assists in any investigation of a sexual harassment complaint. Broadridge will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected sexual harassment. Any employee of Broadridge who retaliates against anyone involved in a sexual harassment investigation will be subjected to disciplinary action, up to and including termination. All associates, paid or unpaid interns, or non-employees<sup>[footnoteRef:2]</sup> working in the workplace who believe they have been subject to such retaliation should inform a supervisor, manager, or the Human Resources Department. All associates, paid or unpaid interns or non-employees who believe they have been a target of such retaliation may also seek relief in other available forums, as explained below in the section on Legal Protections. [2: A non-employee is someone who is (or is employed by) a contractor, subcontractor, vendor, consultant, or anyone providing services in the workplace. Protected non-employees include persons commonly referred to as independent contractors, "gig" workers and temporary workers. Also included are persons providing equipment repair, cleaning services or any other services provided pursuant to a contract with the employer.]
4. Sexual harassment is offensive, is a violation of our policies, is unlawful, and may subject Broadridge to liability for harm to targets of sexual harassment. Harassers may also be individually subject to liability. Associates of every level who engage in sexual harassment, including managers and supervisors who engage in sexual harassment or who allow such behavior to continue, will be penalized for such misconduct.

5. Broadridge will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about sexual harassment, or otherwise knows of possible sexual harassment occurring. Broadridge will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever sexual harassment is found to have occurred. All associates, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment.
6. All associates are encouraged to report any harassment or behaviors that violate this policy. Broadridge will provide all associates a complaint form to report harassment and file complaints.
7. Managers and supervisors are required to report any complaint that they receive, or any harassment that they observe or become aware of, to the Human Resources Department.
8. This policy applies to all associates, paid or unpaid interns, and non-employees, and all must follow and uphold this policy. This policy will be shared with all New York associates and provided to New York associates upon hiring.

#### *What Is "Sexual Harassment"*

Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender. Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex when:

- 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, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called "quid pro quo" harassment. Any employee who feels harassed should report so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

#### *Examples of sexual harassment*

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

Physical acts of a sexual nature, such as:

- Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body or poking another employee's body;
- Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
- Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments;
- Subtle or obvious pressure for unwelcome sexual activities.
- Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.

Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.

Sexual or discriminatory displays or publications anywhere in the workplace, such as:

- Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
- Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
- Sabotaging an individual's work;
- Bullying, yelling, name-calling.

*Who can be a target of sexual harassment?*

Sexual harassment can occur between any individuals, regardless of their sex or gender. New York Law protects associates, paid or unpaid interns, and non-employees, including independent contractors, and those employed by companies contracting to provide services in the workplace. Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

*Where can sexual harassment occur?*

Unlawful sexual harassment is not limited to the physical workplace itself. It can occur while associates are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by associates can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

*Retaliation*

Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a sexual harassment claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

Such retaliation is unlawful under federal, state, and (where applicable) local law. The New York State Human Rights Law protects any individual who has engaged in “protected activity.” Protected activity occurs when a person has:

- made a complaint of sexual harassment, either internally or with any anti-discrimination agency;
- testified or assisted in a proceeding involving sexual harassment under the Human Rights Law or other anti-discrimination law;
- opposed sexual harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment;
- reported that another employee has been sexually harassed; or
- encouraged a fellow employee to report harassment.

Even if the alleged harassment does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith belief that the practices were unlawful. However, the retaliation provision is not intended to protect persons making intentionally false charges of harassment.

### *Reporting Sexual Harassment*

Preventing sexual harassment is everyone’s responsibility. Broadridge cannot prevent or remedy sexual harassment unless it knows about it. Any employee, paid or unpaid intern or non-employee who has been subjected to behavior that may constitute sexual harassment is encouraged to report such behavior to a supervisor, manager or the Human Resources Department. Anyone who witnesses or becomes aware of potential instances of sexual harassment should report such behavior to a supervisor, manager or the Human Resources Department.

Reports of sexual harassment may be made verbally or in writing. A form for submission of a written complaint is attached to this Policy, and all associates are encouraged to use this complaint form. Associates who are reporting sexual harassment on behalf of other associates should use the complaint form and note that it is on another employee’s behalf.

Associates, paid or unpaid interns or non-employees who believe they have been a target of sexual harassment may also seek assistance in other available forums, as explained below in the section on Legal Protections.

### *Supervisory Responsibilities*

All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, are required to report such suspected sexual harassment to the Human Resources Department.

In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected sexual harassment

or otherwise knowingly allowing sexual harassment to continue. Supervisors and managers will also be subject to discipline for engaging in any retaliation.

#### *Complaint and Investigation of Sexual Harassment*

All complaints or information about sexual harassment will be investigated, whether that information was reported in verbal or written form. Investigations will be conducted in a timely manner, and will be confidential to the extent possible. An investigation of any complaint, information or knowledge of suspected sexual harassment will be prompt and thorough, commenced promptly and completed as soon as possible. The investigation will be kept confidential to the extent possible. All persons involved, including complainants, witnesses and alleged harassers will be accorded due process, as outlined below, to protect their rights to a fair and impartial investigation.

Any employee may be required to cooperate as needed in an investigation of suspected sexual harassment. Broadridge will not tolerate retaliation against associates who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

While the process may vary from case to case, investigations will generally include the following steps:

- A thorough review of the allegations;
- Take steps to obtain and preserve any relevant documents or other information;
- Interview the appropriate parties and witnesses;
- Document the investigation per Broadridge's standard policies and procedures;
- Notify the necessary individuals of the final determination;
- Provide any additional information, such as a reminder of non-retaliation to the appropriate parties; and
- Implement any appropriate corrective actions.

#### *Legal Protections And External Remedies*

Sexual harassment is not only prohibited by Broadridge but is also prohibited by state, federal, and, where applicable, local law. Aside from the internal process at Broadridge, associates may also choose to pursue legal remedies with the following governmental entities. While a private attorney is not required to file a complaint with a governmental agency, you may seek the legal advice of an attorney. In addition to those outlined below, associates in certain industries may have additional legal protections.

##### *State Human Rights Law (HRL)*

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State with regard to sexual harassment, and protects associates, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court.

Complaints with DHR may be filed any time within one year of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL, within three years of the alleged sexual

harassment. An individual may not file with DHR if they have already filed a HRL complaint in state court.

Complaining internally to Broadridge does not extend your time to file with DHR or in court. The one year or three years is counted from date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney's fees and civil fines.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: [www.dhr.ny.gov](http://www.dhr.ny.gov).

Contact DHR at (888) 392-3644 or visit [dhr.ny.gov/complaint](http://dhr.ny.gov/complaint) for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

#### *Civil Rights Act of 1964*

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief, but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 associates to come within the jurisdiction of the EEOC.

An employee alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at [www.eeoc.gov](http://www.eeoc.gov) or via email at [info@eeoc.gov](mailto:info@eeoc.gov).

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

#### *Local Protections*

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists. For example, associates who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the

NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit [www.nyc.gov/html/cchr/html/home/home.shtml](http://www.nyc.gov/html/cchr/html/home/home.shtml).

*Contact the Local Police Department*

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

**APPENDIX B**

**New York Sexual Harassment Complaint Form**

New York State Labor Law requires all employers to adopt a sexual harassment prevention policy that includes a complaint form to report alleged incidents of sexual harassment.

If you believe that you have been subjected to sexual harassment, you are encouraged to complete this form and submit it to the Human Resources Department. You will not be retaliated against for filing a complaint.

If you are more comfortable reporting verbally or in another manner, you may do so.

For additional resources, visit: [ny.gov/programs/combating-sexual-harassment-workplace](http://ny.gov/programs/combating-sexual-harassment-workplace)

COMPLAINANT INFORMATION

Name:

Work Address:

Work Phone:

Job Title:

Email:

Select Preferred Communication Method: Email Phone In person

SUPERVISORY INFORMATION

Immediate Supervisor's Name:

Title:

Work Phone:

Work Address:

COMPLAINT INFORMATION

1. Your complaint of Sexual Harassment is made about:

Name:

Title:

Work Address:

Work Phone:

Relationship to you: Supervisor Subordinate Co-Worker Other

2. Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

3. Date(s) sexual harassment occurred:

Is the sexual harassment continuing? Yes No

4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

The last question is optional, but may help the investigation.

5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

If you have retained legal counsel and would like us to work with them, please provide their contact information.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## **APPENDIX C**

### **Equal Employment Opportunity**

Aside from the Equal Employment Opportunity policy, you should be aware that Broadridge provides equal employment opportunities to all employees and applicants for employment without regard to age (40 or over), ancestry, color, gender, gender identity, gender expression, genetic information, marital status, medical condition (including cancer and genetic characteristics), mental or physical disability, military or veteran status, national origin, race, religion, sex (including pregnancy, perceived pregnancy, childbirth, breastfeeding and related medical conditions), sexual orientation, and/or any other characteristic protected by federal, state or local laws and regulations (hereinafter “Protected Characteristic”).

Broadridge is committed to providing all of its employees, applicants, unpaid interns, volunteers, and persons providing services pursuant to a contract with a workplace free of harassment and maintains a strict policy prohibiting harassment on the basis of any Protected Characteristic.

#### *Policy Against Harassment*

In addition to the harassment protections, you should be aware that Broadridge is committed to providing all of its employees, applicants, unpaid interns, volunteers, and persons providing services pursuant to a contract with a workplace free of harassment and maintains a strict policy prohibiting harassment on the basis of any Protected Characteristic.

This prohibition applies to all employees, supervisors, managers, vendors, contractors, clients, visitors, and anyone else employees interact with in the workplace or while performing their duties. No one is expected to tolerate any conduct prohibited by this policy from anyone while at work or engaged in Broadridge’s business.

#### *Complaint Procedure – Harassment or Discrimination*

Supervisors and managers must immediately refer all harassment complaints or harassment or other conduct prohibited by this policy to the Human Resources Department, so that Broadridge can resolve as soon as possible.

All reports describing conduct that is prohibited by this policy will be investigated promptly, objectively and thoroughly, by qualified personnel and in a manner that provides all parties appropriate due process, includes documentation and tracking for reasonable progress, and reaches reasonable conclusions based on the evidence collected. It is the obligation of all employees to cooperate fully in the investigation process.

If the investigation reveals that a violation of this policy or other inappropriate conduct has occurred, Broadridge will take remedial action commensurate with the severity of the offense, including corrective action up to and including termination, as appropriate under the circumstances, regardless of the job positions of the parties involved. Broadridge may take corrective action against an employee for any inappropriate conduct discovered in investigating reports made under this policy, regardless of whether the conduct amounts to a violation of law or even a violation of this policy. If the person who engaged in

conduct prohibited by this policy or other inappropriate behavior is not employed by Broadridge, then Broadridge will take whatever action is reasonable and appropriate to protect its employees and other individuals covered by this policy.

In investigating and in imposing any corrective action, Broadridge will protect the confidentiality of the reporting employee and the allegations to the extent possible. Broadridge cannot guarantee complete confidentiality in that it will need to disclose some information in order to conduct a thorough investigation.

Broadridge will notify the employee who lodged the complaint when its investigation is completed. However, in keeping with its obligations to maintain confidentiality to the extent possible, Broadridge may not disclose the specific remedial action(s) taken to the employee who lodged the complaint or to any employees who participated in the investigation.

#### *Additional Enforcement Information*

In addition to Broadridge's internal complaint procedure, individuals who believe they have been unlawfully harassed, discriminated and/or retaliated against should also be aware that they may file a complaint with the federal Equal Employment Opportunity Commission (EEOC) or the California Department of Fair Employment and Housing (DFEH). Information about how to do this is easily accessible on the internet. Further contact information is below:

California Department of Fair Employment and Housing

2218 Kausen Drive, Suite 100, Elk Grove, California 95758

(800) 884-1684 or (916) 478-7250

U.S. Equal Employment Opportunity Commission Headquarters

131 M Street, NE, Washington, DC 20507

(800) 669-4000 or 202-663-4900 / (TTY) 202-663-4494

The DFEH (or EEOC) will conduct an impartial investigation. If the DFEH determines that there has been a violation of the law, it may issue an accusation and litigate the case before the Fair Employment and Housing Commission or in civil court. If the Commission or a court decides in favor of the complaining party, the following remedies can be ordered: job reinstatement; back pay or promotion; compensatory damages including emotional distress; fines, penalties and/or punitive damages.

**APPENDIX D**

**SEXUAL HARASSMENT IS ILLEGAL  
AND IS PROHIBITED BY  
THE CONNECTICUT DISCRIMINATION EMPLOYMENT  
PRACTICES ACT**

(Section 46a-60(a)(8) of the Connecticut General Statutes)

**AND**

**TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

(Title 42 United States Code Section 2000e *et seq.*)

SEXUAL HARASSMENT MEANS “ANY UNWELCOME SEXUAL ADVANCES OR REQUESTS FOR SEXUAL FAVORS OR ANY CONDUCT OF A SEXUAL NATURE WHEN:

- (1) SUBMISSION TO SUCH CONDUCT IS MADE EITHER EXPLICITLY OR IMPLICITLY A TERM OR CONDITION OF AN INDIVIDUAL’S EMPLOYMENT.
- (2) SUBMISSION TO OR REJECTION OF SUCH CONDUCT BY ANY INDIVIDUAL IS USED AS THE BASIS FOR EMPLOYMENT DECISIONS AFFECTING SUCH INDIVIDUAL; OR
- (3) SUCH CONDUCT HAS THE PURPOSE OR EFFECT OF SUBSTANTIALLY INTERFERING WITH AN INDIVIDUAL’S WORK PERFORMANCE OR CREATING AN INTIMIDATING, HOSTILE OR OFFENSIVE WORKING ENVIRONMENT.”

<p><u>Examples of SEXUAL HARASSMENT include</u> UNWELCOME SEXUAL ADVANCES SUGGESTIVE OR LEWD REMARKS UNWANTED HUGS, TOUCHES, KISSES REQUESTS FOR SEXUAL FAVORS RETALIATION FOR COMPLAINING ABOUT SEXUAL HARASSMENT DEROGATORY OR PORNOGRAPHIC POSTER, CARTOONS OR DRAWINGS</p> <p><u>Remedies for SEXUAL HARASSMENT include</u> CEASE AND DESIST ORDERS BACK PAY COMPENSATORY DAMAGES HIRING, PROMOTION OR REINSTATEMENT</p>
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INDIVIDUALS WHO ENGAGE IN ACTS OF SEXUAL HARASSMENT MAY ALSO BE SUBJECT TO CIVIL AND CRIMINAL PENALTIES.

IF YOU FEEL THAT YOU HAVE BEEN DISCRIMINATED AGAINST, CONTACT THE CONNECTICUT COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES, 450 Columbus Blvd Suite 2, Hartford CT 06103 (TELEPHONE NUMBER (860) 541-3400; TDD NUMBER (860) 541-3459, and Connecticut Toll Free 1(800)477-5737. Connecticut law requires that a formal written complaint be filed with the Commission within 180 days of the date when the alleged harassment occurred.

## **APPENDIX E**

With respect to Broadridge's Policy Against Sexual Harassment and Complaint Procedure – Harassment or Discrimination, you should also be aware that in Massachusetts, the government agencies that enforce the laws against sexual and other unlawful harassment are:

### **1. The Massachusetts Commission Against Discrimination**

Boston Office:

One Ashburton Place, Sixth Floor, Room 601

Boston, MA 02108

Tel: (617) 994-6000

Springfield Office:

436 Dwight Street, Second Floor, Room 220

Springfield, MA 01103

Tel: (413) 739-2145

### **2. The United States Equal Employment Opportunity Commission**

John F. Kennedy Federal Building

475 Government Center

Boston, MA 02203

(617) 565-3200

## APPENDIX F

### Illinois Supplement [For Illinois Employees Only]

As noted above, sexual harassment is a form of sex discrimination and is unlawful under federal, state, and local laws. Sexual harassment and retaliation for reporting sexual harassment is illegal in Chicago. Pursuant to Chicago ordinance, “sexual harassment” means any (i) unwelcome sexual advances or unwelcome conduct of a sexual nature or (ii) requests for sexual favors or conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment; (2) submission to or rejection of such conduct by an individual is used as the basis for any employment decision affecting the individual; or (3) such conduct has the purpose or effect of substantially interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment; or (iii) sexual misconduct, which is behavior of a sexual nature that also involves coercion, abuse of authority, or misuse of an individual’s employment position.

The Company requires all employees annually participate in sexual harassment prevention training.

The Company hopes that any incident of harassment, including but not limited to sexual harassment, can be resolved through the internal process outlined above. However, in Illinois, employees have the right to file formal charges with the Illinois Department of Human Rights (“IDHR”) and/or the United States Equal Employment Opportunity Commission (“EEOC”). Employees working in Chicago may also file a charge with the Chicago Commission on Human Relations (“CCHR”). A charge with IDHR must be filed within 300 days of the alleged incident of harassment. A charge with EEOC must be filed within 300 days of the alleged incident. A charge with the CCHR must be filed within 365 days of the alleged incident.

#### ADMINISTRATIVE CONTACTS

Illinois Department of Human Rights (IDHR)

Chicago: 312-814-6200 or 800-662-3942

Chicago TTY: 866-740-3953

Springfield: 217-785-5100

Springfield TTY: 866-740-3953

Marion: 618-993-7463

Marion TTY: 866-740-3953

Illinois Human Rights Commission (IHRC)

Chicago: 312-814-6269

Chicago TTY: 312-814-4760

Springfield: 217-785-4350

Springfield TTY: 217-557-1500

Chicago Commission on Human Relations (CCHR)

Phone: 312.744.4111

TTY: 312.744.1088

Fax: 312.744.1081

United States Equal Employment Opportunity Commission (EEOC)

Chicago: 800-669-4000

Chicago TTY: 800-869-8001