

Equal Employment Opportunity and Anti-Harassment Policy

The purpose of this policy is to inform all associates that the company prohibits all forms of harassment of associates, agents, contractors, visitors, customers, or vendors.

OUR EQUAL EMPLOYMENT OPPORTUNITY POLICY

As required by law, all CNO companies make employment decisions without regard to race, color, religion, gender, gender identity, sexual orientation, marital status, citizenship status, ancestry or national origin, age, disability, military or veteran status, or any other occupationally irrelevant characteristics protected under federal, state or local law. This Policy applies to associates and applicants in all phases of employment including hiring, promotion, demotion, firing and treatment during employment including rates of pay or other forms of compensation and terms of employment.

Further, all CNO companies will take appropriate steps to provide reasonable accommodations upon request to qualified individuals with physical or mental disabilities, so long as doing so does not cause an undue hardship for the company. CNO companies will also provide reasonable accommodations where an associate's sincerely held religious beliefs or practices are impacted by job requirements, unless the accommodation imposes an undue business hardship for the company.

The 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.

If an employee believes that they have been discriminated against at work, they 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 (1-800-669-6820 (TTY)), visiting their website at [eeoc.gov](https://www.eeoc.gov) or via email at info@eeoc.gov.

OUR ANTI-HARASSMENT POLICY

The CNO companies are further committed to providing a workplace free of harassment because of race, color, religion, gender, gender identity, sexual orientation, marital status, citizenship status, ancestry or national origin, age, disability, military or veteran status, or any other occupationally-irrelevant category protected under federal, state or local law. All such harassment will not be tolerated. The CNO companies are committed to taking all reasonable steps to prevent any kind of harassment from occurring.

Conduct which violates this policy may include, among other things:

- Epithets, slurs, derogatory comments, stereotyping, or threatening, intimidating, or hostile acts that relate to race, sex, age, religion, creed, ancestry, national origin, physical or mental disability, marital status, gender, gender identity, sexual orientation, veteran status, or any other category protected under federal, state, or local law; and
- Refusing to refer to a trans person by their chosen name and a personal pronoun that matches their gender identity, or purposely misgendering; and
- Written or graphic material such as posters, photography, cartoons, drawings, social media posts, chat messages, or emails that denigrates or shows hostility or aversion toward an individual or group because of race, sex, age, religion, creed, ancestry, national origin, physical or mental disability, marital status, gender, gender identity, sexual orientation, veteran status, or any other category protected under federal, state, or local law.

The CNO companies are committed to preventing such harassment, whether from associates or non-associates such as agents, vendors, visitors, clients or contractors.

Specifically included in this policy is a commitment to provide a workplace free of sexual harassment. Sexually harassing conduct may include, among other things:

- Unsolicited and unwelcome comments or conduct of a sexual nature or that are demeaning to women or men as a group (for example, offensive or vulgar jokes, name-calling, comments about one's body or sex life, stereotyping based on a person's sex, touching, leering, ogling, patting, pinching, groping, brushing against another associate's body, indecent exposure, physical gestures or displaying sexually explicit photographs or objects that might interfere with a reasonable person's work);
- Rape, sexual battery, molestation, or attempts to commit these assaults.
- Unsolicited or unwelcome demands, suggestions, or requests for sexual favors or social or sexual encounters, such as:
 - An explicit or implicit promise of preferential treatment with regard to a person's employment in exchange for sexual favors or sexual activity; and subtle or obvious pressure for unwelcome sexual activities.
 - The use of an associate's or applicant's submission to or rejection of sexual conduct as the basis for making, influencing or affecting an employment decision that has an impact upon the terms and conditions of the individual's employment (for example, hiring, firing, promotion, demotion, compensation, benefits, or working conditions).

Prohibited harassment is not necessarily limited to the loss of a job or some other economic benefit. Prohibited harassment that impairs an associate's working ability or emotional well-being at work violates this policy and will not be tolerated.

Given the nature of this type of conduct and the serious effects such conduct can have on the person harassed and the accused, the CNO companies treat alleged violations of this policy seriously and, to the extent possible, confidentially. The CNO companies expect all individuals to treat alleged violations in the same responsible manner.

REPORTING PROCEDURE

The CNO companies' reporting procedure provides for an immediate, thorough and objective investigation of any harassment claim, appropriate disciplinary action against one found to have engaged in prohibited harassment, and appropriate remedies to any associate subjected to harassment.

If an associate has experienced or witnessed conduct that may be in violation of CNO's policy, the associate must report his or her concern. Associates may report potential violations of this policy to an immediate supervisor, another supervisor or manager, a member of HR or the Legal department, or another company resource. If the associate does not feel comfortable reporting potential harassment to any of the individuals identified above, the associate can contact the CNO Ethics Hotline which is confidential, secure and anonymous. The Ethics Hotline is available 24 hours a day, 7 days a week, 365 days a year. The CNO community can reach the Ethics Hotline by calling (855)-TELL-CNO or by emailing TellCNO@GetInTouch.com. Additional information can be found at: [CNO Ethics Hotline](#).

Associates based in New York State may also submit the [New York State Complaint Form](#) to a member of the HR, Legal Department, or to the Ethics Hotline at TellCNO@GetInTouch.com.

Supervisors who become aware of any potential violation of this policy must report the potential violation to their Employee Relations (ER) Manager. Failure to report potential violations will result in appropriate discipline, up to and including termination.

No action will be taken against any associate because they report behavior believed to violate this policy, though deliberately false or malicious accusations will be considered a violation of this policy. All associates are assured that action will be taken to investigate and resolve complaints and that the companies are firm in their commitment to maintaining an environment free of discrimination and harassment.

Violations of this policy will not be tolerated and will result in appropriate disciplinary action, up to and including termination.

NEW YORK STATE DIVISION OF HUMAN RIGHTS (DHR)

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to employers in New York State with regard to sexual harassment, and protects employees, 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 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 discrimination. An individual may not file with DHR if they have already filed an HRL complaint in state court.

Complaining internally to CNO 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 discrimination has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If discrimination 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 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, (718) 741-8400, or dhr.ny.gov.

Contact DHR at (888) 392-3644 or visit 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.

Please help us maintain a comfortable work environment free from discriminatory and harassing behavior.

PROTECTION AGAINST RETALIATION

The CNO companies also prohibit retaliation against any associate for reporting, filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by any of the CNO companies or a federal or state enforcement agency. Associates should report any perceived retaliation to their Supervisor, ER Manager, Legal, or the CNO Ethics Hotline. Any complaint will be immediately, objectively and thoroughly investigated in accordance with the reporting procedure outlined above. If a report of retaliation is substantiated, appropriate disciplinary action, up to and including termination, will be taken.

ENFORCEMENT

Violation of this policy as stated above may result in disciplinary action up to and including termination per Policy 2600, Disciplinary Process.

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, employees 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 nyc.gov/html/cchr/html/home/home.shtml.

DISCLAIMER

The Company reserves the right to add, revise and amend this policy at any time at their discretion.