

 <b>HR - 02</b>	<b>ANTI-HARASSMENT, DISCRIMINATION AND RETALIATION POLICY</b>	<b>English</b>
	<b>Owner:</b> Chief Human Resources Officer	<b>Last Review:</b> 2020.10.26
	<b>Department:</b> Human Resources	

## POLICY

It is the policy of Hubbell Incorporated to provide a workplace free from any form of discrimination, harassment, or retaliation, including sexual harassment, and Hubbell requires all employees of Hubbell Incorporated, its subsidiaries and affiliates (collectively, "Hubbell") to join in this commitment and to refrain from any conduct that is harassing, discriminatory or retaliatory.

## SCOPE

This Policy applies to all employees of Hubbell Incorporated, its subsidiaries and affiliates.

## PURPOSE

Hubbell does not tolerate and prohibits discrimination, harassment or retaliation of or against our job applicants, contractors, interns, volunteers, or employees by another employee, supervisor, vendor, customer, or any third party on the basis of race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or gender expression (including transgender status), sexual orientation, marital status, military and veteran status, physical or mental disability, protected medical condition as defined by applicable state or local law, genetic information, or any other characteristic protected by applicable federal, state, or local laws and ordinances. Hubbell is committed to a workplace free of discrimination, harassment and retaliation.

Hubbell does not condone and will not tolerate any form of discrimination, harassment or retaliation. Hubbell is dedicated to ensuring the fulfillment of this Policy as it applies to all terms and conditions of employment, including recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities, and general treatment during employment. All discrimination, harassment and retaliation is unacceptable in the workplace and in any work-related settings, such as business trips and business-related social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party.

## PROCEDURE

### Prohibited Conduct:

Discrimination. Discrimination under this Policy means treating differently, or denying or granting a benefit to an individual, because of the individual's protected characteristic.

Harassment. Harassment under this Policy means any unwelcome verbal, visual or physical conduct creating an intimidating, offensive, or hostile work environment that interferes with work performance. Harassment is conduct that denigrates or shows hostility or aversion towards an individual because of any protected characteristic. Such conduct violates this Policy, even if it does not rise to the level of a violation of applicable federal, state, or local laws. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this Policy.

Examples of conduct that violate this Policy include:

- **Verbal:** slurs, jokes, insults, epithets, or teasing.
- **Physical:** physically threatening another, or blocking someone's way.
- **Visual:** offensive gestures, posters, symbols, cartoons, drawings, computer displays, or e-mails.

Sexual Harassment. Sexual harassment under this Policy can include all of the above actions, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities, nonverbal conduct such as derogatory gestures or facial expressions of a sexual nature, following a person, or looking up and down a person's body, and other verbal or physical conduct of a sexual nature.

Examples of conduct that violates this Policy include:

- unwelcome sexual advances, flirtations, advances, leering, whistling, touching, pinching, assault, blocking normal movement
- requests for sexual favors or demands for sexual favors in exchange for favorable treatment
- obscene or vulgar gestures, posters, or comments
- sexual jokes or comments about a person's body, sexual prowess, or sexual deficiencies
- propositions, or suggestive or insulting comments of a sexual nature
- derogatory cartoons, posters, and drawings
- sexually explicit e-mails or voicemails
- uninvited touching of a sexual nature
- unwelcome sexually related comments
- conversation about one's own or someone else's sex life
- conduct or comments consistently targeted at only one gender, even if the content is not sexual
- teasing or other conduct directed toward a person because of the person's gender

The purpose of this Policy is not to regulate personal morality. It is to ensure that all employees are free from harassment. Depending upon the circumstances, improper conduct also can include teasing or other conduct directed toward a person because of his or her gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

Retaliation. Retaliation under this Policy means adverse conduct taken because an individual reported an actual or perceived violation of this Policy, opposed practices prohibited by this Policy, or participated in the reporting and investigation process described below. "Adverse conduct" includes but is not limited to: shunning and avoiding an individual who reports harassment, discrimination or retaliation; express or implied threats or intimidation intended to prevent an individual from reporting harassment, discrimination or retaliation; and denying employment benefits because an applicant or employee reported harassment, discrimination or retaliation or participated in the reporting and investigation process described below.

Reporting Misconduct. Anyone who feels that he or she has been subjected to conduct which violates this Policy or our Equal Employment Opportunity Policy (HR-12) should immediately report the matter to their immediate supervisor or another supervisor; the Human Resources, Compliance or Legal Departments; or to our Speak Up Today program at (888) 418-1667 or [www.speakuptoday.com](http://www.speakuptoday.com). If you are unsure of to whom to raise an issue of harassment, or if you have not received a satisfactory response within five (5) business days after reporting any incident of what you perceive to be harassment, please contact our Speak Up Today program.

A supervisor who learns of conduct in violation of this Policy, whether in a formal complaint or informally, must immediately report the matter to senior management or to the Human Resources, Compliance or Legal Departments.

Every report of perceived harassment will be fully investigated, and corrective action will be taken where appropriate. Employees are required to cooperate in all investigations. Violation of this Policy will result in disciplinary action, up to and including termination. All complaints will be handled with discretion to the fullest extent possible, but confidentiality cannot be guaranteed.

Hubbell will not allow any form of retaliation against individuals who report unwelcome conduct to management in good faith or who cooperate in the investigations of such reports in accordance with this Policy. Employees who make complaints in bad faith may be subject to disciplinary action, up to and including discharge.

## **ADMINISTRATION**

Roles and Responsibilities. Human Resources has responsibility in overseeing this Policy.

Monitoring, Evaluation and Review. This Policy will be reviewed annually.

Exceptions. There are no exceptions to this Policy, but each complaint will be handled on a case by-case basis depending upon the investigation and all facts and circumstances surrounding the complaint to determine appropriate course of action.

## **ACCOUNTING AND DISCLOSURE**

None

## **REPORTING**

None

## **DEFINITIONS**

None

## **RELATED DOCUMENTS** (Policies, Guidelines, Standards)

State Addenda

New York State Sexual Harassment Complaint Form

I. **CALIFORNIA DISCRIMINATION, HARASSMENT, AND RETALIATION PREVENTION POLICY (ADDENDUM TO ANTI-HARASSMENT, DISCRIMINATION AND RETALIATION POLICY)**

**Reporting Procedures.**

During the investigation, the Company generally will interview the complainant and the accused, conduct further interviews as necessary and review any relevant documents or other information. Upon completion of the investigation, the Company will determine whether this policy has been violated based upon its reasonable evaluation of the information gathered during the investigation. The Company will inform the Complainant and the accused of the results of the investigation.

The Company will take corrective measures against any person who it finds to have engaged in conduct in violation of this policy, if the Company determines such measures are necessary. These measures may include, but are not limited to, counseling, suspension, or immediate termination. Anyone, regardless of position or title, whom the Company determines has engaged in conduct that violates this policy will be subject to discipline, up to and including termination. In addition to being a violation of this policy, harassment, discrimination or retaliation can also be against the law. Employees who engage in conduct that rises to the level of a violation of law can be held personally liable for such conduct.

\* \* \* \*

Remember, we cannot remedy claimed discrimination, harassment or retaliation unless you bring these claims to the attention of management. Please report any conduct which you believe violates this policy.

## II. CONNECTICUT SEXUAL HARASSMENT (ADDENDUM TO ANTI-HARASSMENT, DISCRIMINATION AND RETALIATION POLICY)

Sexual harassment is illegal and prohibited by Connecticut and federal law in the workplace, pursuant to § 46a-60(a)(8) of the Connecticut General Statutes and Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.* Sexual harassment is defined in Conn. Gen. Stat. §46a-60(b)(8) as any unwelcome sexual advances or request for sexual favors or any conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or,
- 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.

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to sexual harassment, the employee may file a formal complaint with the Connecticut Commission on Human Rights and Opportunities (the "Commission") at 860-541-3400, CT Toll Free 1-800-477-5737, or online at [www.ct.gov/CHRO](http://www.ct.gov/CHRO).

Individuals who engage in acts of sexual harassment may be subject to civil penalties in the form of a cease and desist orders, back pay, compensatory damages, hiring, promotion or reinstatement, emotional distress, as well as attorney's fees, costs, pre- and post- judgment interest and punitive damages (if the case is tried in court). Individuals may also be subject to additional criminal penalties stemming from acts of sexual harassment.

Connecticut law requires that a written complaint be filed with the Commission within 300 days of the date the alleged harassment for events occurring on or after October 1, 2019.

**III. ILLINOIS DISCRIMINATION AND SEXUAL HARASSMENT (ADDENDUM TO ANTI-HARASSMENT, DISCRIMINATION AND RETALIATION POLICY)**

In compliance with the Illinois Human Rights Act (“Act”), all employees have the right to be free from unlawful discrimination or sexual harassment. This means that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act. This applies to all employer actions, including hiring, promotion, discipline and discharge.

Employees also have the right to reasonable workplace accommodations based on pregnancy and disability. This means employees can ask for reasonable changes to their job if needed because they are pregnant or disabled.

It is also unlawful for employers to treat people differently or otherwise retaliate against an employee because they have reported discrimination or sexual harassment, participated in an investigation, or helped others exercise their right to complain about discrimination or sexual harassment.

Aside from the internal complaint process at the Company, employees may choose to file a charge of discrimination or sexual harassment under the Act with the Illinois Department of Human Rights (“IDHR”). The charge process for violations of the law can be initiated by completing the form at [www.illinois.gov/dhr](http://www.illinois.gov/dhr) or by contacting the IDHR at [IDHR.Intake@illinois.gov](mailto:IDHR.Intake@illinois.gov), or either of these offices:

Chicago Office  
100 W. Randolph St., 10th Floor  
Chicago, IL 60601  
(312) 814-6200  
(866) 740-3953 (TTY)  
(312) 814-6251 (Fax)

Springfield Office  
535 W. Jefferson Street, 1<sup>st</sup> Floor  
Springfield, IL 62702  
(217) 785-5100  
(866) 740-3953 (TTY)  
(217) 785-5106 (Fax)

Employees also can contact the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.

**IV. MASSACHUSETTS SEXUAL HARASSMENT (ADDENDUM TO ANTI-HARASSMENT, DISCRIMINATION AND RETALIATION POLICY)**

Sexual harassment and retaliation against an employee because the employee filed a complaint of sexual harassment or because an employee aided in an investigation of a complaint of sexual harassment are unlawful. Using our complaint and investigatory procedures does not prohibit an employee from contacting or filing a complaint with the appropriate governmental agency. "Sexual harassment" means sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: (a) submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or (b) such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to sexual harassment, the employee may file a formal complaint with the government agency or agencies set forth below.

The name, address, and telephone numbers of the state and federal enforcing agencies for our Massachusetts-based employees are as follows:

**Massachusetts Commission Against Discrimination (MCAD)**

One Ashburton Place  
Room 601  
Boston, MA 02108  
(617) 994-6000

Denholm Building  
484 Main Street, Room 320  
Worcester, MA 01608  
(508) 799-8010

436 Dwight Street  
Room 220  
Springfield, MA 01103  
(413) 739-2145

**(Federal) Equal Employment Opportunity Commission (EEOC)**

John F. Kennedy Federal Building  
15 New Sudbury Street, Room 475  
Boston, MA 02203  
(800) 669-4000 or (800) 669-6820 TTY  
[info@eoc.gov](mailto:info@eoc.gov)

As of October 31, 2020, the New Bedford office is closed and individuals seeking MCAD services will need to call the Boston Office.

V. **NEW YORK SEXUAL HARASSMENT (ADDENDUM TO ANTI-HARASSMENT, DISCRIMINATION AND RETALIATION POLICY)**

In addition to being a violation of this policy, sexual harassment and retaliation are also unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment are unlawful.

**Reporting Procedures.** In addition to the reporting procedures set forth in Hubbell's main Anti-Harassment, Discrimination and Retaliation Policy, written complaints can also be submitted internally using the form provided with this policy, if the Employee prefers to do so.

During the investigation, the Company generally will interview the complainant and the accused, conduct further interviews as necessary and review any relevant documents or other information. Upon completion of the investigation, the Company will determine whether this policy has been violated based upon its reasonable evaluation of the information gathered during the investigation. The Company will inform the complainant and the accused of the results of the investigation.

**Legal Protections and External Remedies.** Aside from the internal complaint process at the Company, employees may choose to pursue external legal remedies with the following governmental entities based on the noted federal, state and local 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 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 the Division of Human Rights (DHR) or in New York State Supreme Court.

Complaints with DHR may be filed any time within one year (*three years effective August 12, 2020*) 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 an HRL complaint in state court.

Complaining internally to the Company 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.

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. 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 employees 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.

*New York State Sexual Harassment Complaint Form*

New York State Labor Law requires all employers to provide New York Employees with a complaint form to report alleged incidents of sexual harassment.

If you believe that you have been subjected to sexual harassment, you may complete this form and submit it to your manager; another manager; the human resources, compliance or legal departments; or the Vice President of Audit and Compliance.

As set forth in Hubbell's Anti-Harassment Policy, you may also file a complaint by contacting your manager or another manager; the human resources, compliance or legal departments; the Vice President of Audit and Compliance at (475) 882-4000; or by contacting Speak Up Today at (888) 418-1667. Hubbell's Anti-Harassment Policy strictly prohibits retaliation against an individual for filing a complaint. Your complaint will be investigated as per the process set forth in Hubbell's Anti-Harassment Policy.

**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:

*Signature:* \_\_\_\_\_

*Date:* \_\_\_\_\_