

## **Statement of Commitment to Provide an Inclusive Workplace**

The production company (“Company”) is committed to providing equal employment opportunities for all people, fostering a diverse and inclusive workforce, and maintaining a work environment in which all individuals are treated with respect and dignity. Equal employment opportunity is a fundamental principle of the Company’s commitment to ethical business conduct. Every individual has the right to work in a professional, inclusive workplace that is free of bias, prejudice, abusive conduct, and discriminatory and/or harassing behavior.

The purpose of this Equal Employment Opportunity and Harassment Prevention Policy (the “Policy”) is to carry out this commitment and ensure that the Company, and everyone working on this production, as well as third parties, business partners, and visitors, maintain a professional atmosphere that promotes equal employment opportunities and prohibits discrimination and harassment.

## **Scope of Policy**

This Policy prohibits unlawful discrimination in employment decisions or harassing any person in the workplace, including, but not limited to, harassment on the basis of a characteristic protected by this Policy. The terms “discrimination” and “harassment” are explained below. The characteristics protected include perceived or actual age; alienage or citizenship status; ancestry; arrest or conviction records, breastfeeding, or medical condition relating to breastfeeding; caregiver status; childbirth, or medical conditions relating to childbirth; color; creed; disability (mental, sensory or physical); gender, gender expression/identity; genetic information (including genetic predisposition or carrier status); immigration status, marital or partnership status; medical conditions that are legally protected; military/veteran status; national origin; pregnancy; race; religion or religious belief (including religious dress or grooming practices); sex, sexual orientation, or transgender status; unemployment status; status as a victim of domestic violence, sexual violence or stalking; or any other basis, characteristic, or status protected by federal, state, provincial or local law, ordinance, or regulation (together, the “Protected Characteristics”). This Policy also prohibits abusive conduct towards someone in the workplace, and retaliation against someone who, in good faith, reports a suspected violation of this Policy.

This Policy applies to all facets of the employment relationship including, for example, recruiting, hiring, training, promotion, work assignments, compensation, benefits, and other terms and conditions of employment. It applies to all individuals working on this production (including non-supervisory staff, crew, talent, supervisors, managers, executives, and to both “above the line” and “below the line” individuals), applicants for employment, interns (paid or unpaid), temporary employees, background actors, and other persons performing services in the workplace (e.g., contractors, vendors, consultants, business partners, or personnel working on our premises who are employed by temporary agencies).

Employees and all other members of the production staff may not unlawfully discriminate against, or harass, or retaliate against any other member of the production staff, employee, applicant, vendor, or visitor. This Policy prohibits harassment, and retaliation that rises to the level of being unlawful, as well as conduct that may not rise to that level, but is still deemed inappropriate in the Company’s workplace.

Conduct prohibited by this Policy is unacceptable both in the workplace and in any work-related setting,

such as business meetings, business trips, field assignments, location shoots, and studio or Company-sponsored social events, whether formal or informal.

Similarly, interactions including but not limited to calls, texts, emails, and social media exchanges, between individuals working on this Production can constitute workplace harassment even if those communications occur away from workplace premises, on personal devices, or during non-work hours, if they impact the workplace environment.

It is the responsibility of every employee of the Company and every member of the production staff, including talent and producers, to follow this Policy conscientiously. If you believe another employee, production staff member or third-party vendor has violated this Policy, you should report that violation under the procedures set out in the “Reporting Complaints” section of this Policy. Anyone found to have violated this Policy will be subject to discipline, up to and including termination of employment or contract.

### **Unlawful Discrimination is Prohibited**

The Company strictly prohibits unlawful discrimination against employees, applicants, interns, and relevant third parties on the basis of one or more of the Protected Characteristics. The Company also prohibits conduct that may not rise to the level of unlawful discrimination, but is still considered inappropriate conduct in the workplace.

Unlawful discriminatory conduct can include any adverse employment action, including, but not limited, to restricting opportunities to work on certain projects on the basis of one or more Protected Characteristics—especially when these decisions have a negative impact on earnings, development, or career progression.

### **Sexual Harassment is Prohibited**

The Company is committed to eliminating all forms of sexual harassment of its employees and production staff, including verbal, non-verbal, and physical conduct. This commitment extends to ensuring that third parties do not subject Company employees and/or production staff to sexual harassment on the Company’s premises, production sites, or in connection with work-related events, which may include events such as premiere, finale, wrap, and holiday parties. This commitment also extends to those working virtually and interacting in virtual environments such as Zoom.

The Company strictly prohibits sexual harassment against employees, applicants, interns, and other individuals performing services in or outside the workplace on the basis of any of the Protected Characteristics. When conduct rises to the level of unlawful harassment, it subjects the Company to legal liability for harm to victims of harassment. Harassers may also be individually subject to legal liability.

Sexual harassment is a form of gender-based discrimination. Sexual harassment is unwelcome conduct which is either:

- of a sexual nature; or
- directed at an individual because of their sex, sexual orientation, self-identified or perceived

sex, gender expression, gender identity, the status of being transgender, pregnancy or perceived pregnancy, childbirth, breastfeeding, or any related medical conditions.

For the purposes of this Policy, “unwelcome conduct of a sexual nature” means unwelcome or unwanted sexual advances; requests for sexual favors; and other verbal, non-verbal, or physical 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 employment decisions affecting such individual; or
- (3) Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment.

The behavior in (1) and (2) occurs, for example, when a person of authority tries to trade job benefits for sexual favors. Job benefits at issue can include hiring, promotion, continued employment, or any other terms, conditions or privileges of employment. This behavior is also called “quid pro quo” harassment.

Sexual harassment includes all forms of gender discrimination including gender role stereotyping and treating employees differently because of their gender. Sexual harassment may involve individuals of the same or different genders.

The behavior need not be motivated by sexual desire or even be sexual in nature. For example, when a manager yells only at females and not at males, that behavior may amount to sex-based harassment if the conduct is severe or pervasive and directed at individuals because of their sex.

Sexual harassment may include a range of subtle and not so subtle behaviors that create an unprofessional and hostile working environment. It is not possible to specify all the circumstances that may constitute sexual harassment. Some examples of sexual harassment include, but are not limited to:

- (1) Unwelcome sexual advances or sexual propositions;
- (2) Subtle or overt pressure for sexual favors;
- (3) Sexual jokes and innuendos;
- (4) Verbal abuse of a sexual nature;
- (5) Graphic commentary about an individual’s body;
- (6) Discussions of an individual’s sexual prowess or sexual deficiencies;
- (7) Leering, whistling, touching, tickling, patting, brushing up against, cornering, kissing, pinching, fondling, and forced sexual acts or assault;
- (8) Suggestive, insulting, or obscene comments or gestures;
- (9) Display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail or text messages); or
- (10) Other physical, verbal, or visual conduct of a sexual nature.

#### **Other Forms of Harassment are Prohibited**

The Company prohibits all other forms of harassment based on a Protected Characteristic and

abusive conduct towards someone in the workplace. Harassment includes unwelcome verbal or non-verbal conduct that denigrates or shows hostility/aversion toward an individual based on a Protected Characteristic. Prohibited harassment includes conduct that:

- has the purpose or effect of creating a work environment that a reasonable person would find intimidating, hostile, degrading, or offensive; or
- has the purpose or effect of unreasonably interfering with an individual's work performance; or
- otherwise adversely affects an individual's employment opportunities.

Behaviors which may constitute harassment include, but are not limited to:

- Making derogatory or discriminatory gestures
- Using crude, degrading, vulgar or offensive language; discriminatory comments or slurs, discussing sexual activities; sharing off-color jokes, epithets or comments, including playing music or other audio-visual material containing offensive language
  - Communications can violate this Policy whether they're made in person or by other means (e.g., calls, texts, e-mails, or social media).
- Displaying in the workspace materials that insult, degrade, negatively depict, or exploit others based on Protected Characteristics
  - "Displays" may include pictures, objects, posters, cartoons, and materials viewable on a personal computer or mobile device. Viewing or sending such materials counts as "displaying" it.

Behaviors which may constitute abusive conduct include, but are not limited to:

- Sabotaging an employee's work performance, or destroying an individual's work product;
- Excessive scrutiny or monitoring of an employee's work beyond constructive criticism that is reasonable and warranted;
- Criticizing a person publicly;
- Excluding an employee from meetings and other work events without justification;
- Spreading malicious rumors;
- Yelling or using profanity directed at someone else;
- Threatening conduct

The intent behind the behavior is irrelevant; the effect on others is what counts. If an attempt at humor offends or intimidates someone, the behavior may be considered harassment or abusive conduct, regardless of the intent to amuse. Not intending to harass is not a defense.

### **Mature Content in the Workplace**

It is important for you to recognize and understand that the Company is engaged in the business of developing, producing, distributing, and licensing filmed entertainment and other creative products, many of which include adult-themed content or raw news footage. Some jobs on this production may include discussion of, or require exposure to, materials (art, animation, filmed or video images) that are sexually explicit; that contain violence, nudity, or partial nudity; or that relate to topics that otherwise might be considered inappropriate for other workplaces. With this in mind, you

understand and agree that:

- By accepting and continuing to work on the Company's production, you acknowledge that you may encounter such discussions or materials in the course of your work and that, in this context, your exposure to such discussions or materials does not constitute harassment.
- In keeping with its commitment to a workplace free of harassment, the Company expects that any such discussions or materials will be handled with professionalism and maturity, will not be directed at a person because of that individual's sex, gender, race, sexual orientation, or other Protected Characteristics, and will not be used to harass others, as defined in this Policy.
- If you feel that such discussions or materials are being used to harass, as defined in this Policy, or if you become uncomfortable with discussions or other activities related to the creation, production, or distribution of our filmed entertainment products, you should raise your concerns through the reporting procedures below.

### **Prohibition of Retaliation**

The Company prohibits retaliation against any individual who reports alleged unlawful discrimination or harassment in good faith or participates in an investigation of such reports in accordance with this Policy. Retaliation is an adverse job action taken against an individual as a result of their coming forward to make or support a claim of harassment or discrimination. No person will be subject to discipline, retaliation, intimidation, harassment, coercion, or any other adverse treatment because that person has made a report in good faith about a potential violation of this Policy or provided truthful information while cooperating with an investigation of alleged unlawful discrimination, harassment, or retaliation. Retaliation against an individual for reporting alleged harassment or discrimination, or for participating in an investigation of a related claim, is a serious violation of this Policy and, like harassment or discrimination itself, will be subject to disciplinary action, up to and including termination of employment or contract.

### **Reporting Complaints**

Early reporting and intervention are the most effective methods of resolving actual or perceived incidents of discrimination, harassment, or retaliation. For the Company to be able to remedy alleged discrimination, harassment, or retaliation, it is imperative that claims be brought to the attention of an appropriate individual(s). Therefore, any employee or production staff member who is the subject of, who has knowledge of, or who witnesses any possible prohibited discrimination, harassment, or retaliation is expected to immediately bring such information to the Company's attention regardless of the offender's identity or position. The report may be made anonymously. Additionally, the Company encourages employees, supervisors, managers, and all personnel to document any incidents of allegedly prohibited conduct.

### **Reporting Procedure**

Those persons covered by the Policy who experience, have knowledge of, or witness conduct that they believe is contrary to this Policy, or who have concerns about such matters, should report a suspected violation as soon as possible and before the conduct becomes severe or pervasive. Any employee witnessing harassment as a bystander is encouraged to report it. Anyone may report concerns to any of the following:

- (1) The Production People & Culture Partner (HR)

- (2) The Studio Executive in Charge of Production
- (3) The Executive Producer
- (4) The Studio Legal Department or Labor Relations Department (if applicable)
- (5) The Company's Ethics Line at: +1 800-398-6395 (U.S.), or all other countries here: [wbd.ethicspoint.com](http://wbd.ethicspoint.com).

You are never required to report your concern directly to a person who you feel has harassed, discriminated against, or retaliated against you or another person.

The Company has also provided a complaint form attached to this Policy that may be used to report discrimination, harassment, or retaliation. A completed complaint form should be returned to one of the individuals listed above.

The availability of this Reporting Procedure does not preclude individuals who believe they are being subjected to discriminatory, harassing, or retaliatory conduct from promptly advising the offender that his/her behavior is unwelcome and requesting that it be discontinued. Advising an offender of their own unwelcome behavior does not constitute a report under the Reporting Procedure, even if the offender is one of the individuals designated to receive reports under this Policy.

Any manager or supervisor to whom a report of alleged discrimination, harassment, or retaliation is made, or who becomes aware of possible discrimination, harassment, or retaliation is required to immediately notify the Production People & Culture Partner and must follow their instructions as to how best to proceed. In addition to being subject to discipline if they engage in such conduct themselves, managers and supervisors will be subject to discipline for failing to report suspected discrimination, harassment, or retaliation or for knowingly allowing such conduct to continue.

### **Investigation and Responsive Action**

Reports of alleged discrimination, harassment, or retaliation will be investigated fairly, promptly, thoroughly, and impartially and will provide all parties appropriate due process and will reach reasonable conclusions based on the evidence collected. The investigation will be handled with sensitivity and confidentiality will be maintained throughout the investigatory process to the extent possible, practicable, and appropriate under the circumstances. Complete confidentiality cannot be guaranteed when it interferes with the Company's ability to fulfill its obligations under local laws and the Company's policies. The resolution will be communicated to you and the other parties involved when relevant and appropriate.

Once the investigation is complete, the Company will make a determination as to whether improper conduct that violates this Policy occurred and its impact on the workplace. If the Company determines that improper conduct in violation of this Policy occurred, prompt and effective remedial action will be taken, commensurate with the severity of the offense, up to and including immediate termination of employment or contract. The Company will also respond appropriately to behavior which may not be legally actionable harassment but which, if left unchecked, may lead to legally actionable harassment.

### **Cooperation in Investigations**

The Company investigates work-related matters including, for example, reports of violations of this

Policy, misconduct, theft, accidents, and use of drugs on the Company's premises. Investigations may include interviews with parties involved and, where necessary, with individuals who may have observed the alleged conduct, or who may have other relevant knowledge; reviewing documents (both in hard copy and electronic formats); and collecting other information. Every employee and other member of the production staff is required to cooperate in Company-conducted investigations and provide truthful and accurate information as requested.

Failure to comply with this policy, including the making of knowingly or maliciously false statements in connection with any investigation, may result in discipline, up to and including termination of employment or contract. A breach of this policy includes conduct that violates this policy and its impact on the workplace

In certain circumstances, the Company may direct employees to keep an employee's complaint and any related investigation confidential or as confidential as possible under the law to further the goals of federal, state, and local harassment and discrimination laws. Moreover, nothing contained in any such confidentiality directive or in this Policy is intended to prohibit employees from discussing terms and conditions of employment with others, or otherwise restrict employees' rights under the National Labor Relations Act in connection with the investigation of unfair labor practice charges or arbitrations under a collective bargaining agreement; reporting to any government agency, including the National Labor Relations Board, the Equal Employment Opportunity Commission, or any other state or local government agency, possible violations of federal or state law or regulations; or making, to any government agency, any other disclosures that are protected under the whistleblower or any other provisions of federal or state law or regulations.

### **Mandatory Training**

You must timely complete any training regarding this Policy that is assigned to you. Failure to do so may lead to disciplinary action.

### **Additional Local Information and Resources**

Any individual who has any questions or concerns about this Policy is encouraged to discuss them with the Production People & Culture Partner.

Unlawful discrimination, harassment, and retaliation towards coworkers and third parties, as well as supervisors and managers are not only prohibited by the Company and this Policy, but also by federal, state, provincial, and applicable local laws. Local laws typically protect all persons, including non-citizens, from unlawful discrimination, harassment, and retaliation.

Individuals who are subjected to unlawful discrimination, harassment, or retaliation may be entitled to certain legal remedies, including monetary damages, civil penalties, and injunctive relief (such as an order that certain action be taken or that certain behavior stop). Aside from the internal reporting procedure set forth above, individuals may also choose to pursue external remedies through the relevant federal, state, and local governmental entities or courts. Individuals should contact the county, city, or town in which they work to find out if such laws and local governmental entities exist. Some of these governmental entities are identified below:

U.S. Equal Employment Opportunity Commission (EEOC)

The EEOC enforces federal anti-discrimination laws, including Title VII of the Civil Rights Act of 1964. Individuals can file a complaint with the EEOC. Filing a complaint with the EEOC is a prerequisite to pursuing a case of discrimination or harassment in federal court. More information about the EEOC and filing a complaint can be found at [www.eeoc.gov](http://www.eeoc.gov).

New York

In New York, harassment does not need to be severe or pervasive to be illegal. The New York Human Rights Law specifies that whether harassing conduct is considered petty or trivial is to be viewed from the standpoint of a reasonable victim of discrimination with the same protected characteristics. The New York State Division of Human Rights (DHR) enforces New York State's Human Rights Law, which prohibits discrimination and harassment. Individuals can file a complaint alleging violation of the Human Rights Law with the Division or can file a claim in New York Supreme Court. 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).

Individuals who work in New York City can also file complaints of discrimination or harassment under the New York City Human Rights Law with the New York City Commission on Human Rights. More information can be found at [www.nyc.gov/html/cchr](http://www.nyc.gov/html/cchr).

California

A complaint of discrimination or harassment may be filed with the Civil Rights Department (CRD), which serves as a neutral fact-finder and attempts to help the parties voluntarily resolve the complaint. If the CRD finds evidence of discrimination or harassment and settlement efforts fail, the CRD then may file a lawsuit on the complainant's behalf. More information can be found at <https://calcivilrights.ca.gov/>.

Oregon

Under Oregon law, an employee has five years from the date of the last discriminatory act to file a complaint with the state BOLI Civil Rights Division or to file a lawsuit against the employer. Additionally, for Oregon employees the Company will not require or coerce an employee to enter into a non-disclosure or non-disparagement agreement. However, an employee in Oregon claiming to be aggrieved by prohibited conduct may voluntarily request to enter into a non-disclosure or non-disparagement agreement with a seven-day revocation period. More information can be found at <https://www.oregon.gov/boli/workers/pages/sexual-harassment.aspx>.



**HARASSMENT, DISCRIMINATION AND RETALIATION COMPLAINT FORM**

If you believe that you have experienced or witnessed conduct that is prohibited by our Equal Opportunity and Harassment Prevention Policy (the “Policy”), you are encouraged to use this form to report such conduct or report it verbally to any one or more of the following persons: Production People & Culture Partner, Studio Executive in charge of Production, Executive Producer, or the Studio Legal Department or Labor Relations Department (if applicable). You may also use the 24-hour Ethics Line at (800) 398-6395 (U.S.) or this website outside the U.S.: [wbd.ethicspoint.com](http://wbd.ethicspoint.com) to report any concerns about potential violations of the Policy.

**Your Name and Title:** \_\_\_\_\_

**Your Phone Number:** \_\_\_\_\_

**Your Email Address:** \_\_\_\_\_

**Your Immediate Supervisor/Manager:** \_\_\_\_\_

**Date Offending Conduct First Occurred:** \_\_\_\_\_

**Date Offending Conduct Last Occurred:** \_\_\_\_\_

**Discrimination and/or Harassment:** If you believe that you have been subjected to discrimination and/or harassment, witnessed discrimination and/or harassment, or have knowledge of discrimination and/or harassment, please describe the conduct or actions (if you need more space, please continue on a separate piece of paper):

**Retaliation:** If you believe that you or another individual covered by this Policy were treated differently after reporting or helping someone report discrimination and/or harassment, participating as a witness in an investigation or other judicial or administrative action, or opposing discrimination and/or harassment, check the box below, state how you or another individual opposed discrimination or harassment, and explain the retaliatory conduct:

☐ I believe that I and/or another individual was retaliated against:

**Alleged Wrongdoer:** Identify the person or people who discriminated against, harassed, and/or retaliated against you and/or another individual (if you need more space, please list them on a separate piece of paper):

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Name: \_\_\_\_\_ Title: \_\_\_\_\_

**Witnesses:** List all witnesses to the discriminatory, harassing, or retaliatory conduct (if you need more space, please list them on a separate piece of paper):

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Name: \_\_\_\_\_ Title: \_\_\_\_\_

**Documents:** If there are any documents that you believe are relevant to your complaint, please attach them.

**Additional Information:** If there is any additional information that you would like to provide or that you believe would assist us in our investigation, tell us more in the space below (if you need more space, please continue on a separate piece of paper):