

EQUAL EMPLOYMENT OPPORTUNITY



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EMPLOYMENT DECISIONS

The Company's employment actions and decisions—including recruitment, hiring, promotion, compensation, demotion, transfer, layoff, termination and training—are made without regard to a cast or crew member's actual or perceived race (including traits associated with race, such as hair texture, hair type or protective hairstyles), religion, color, sex (including, pregnancy, childbirth, breastfeeding and related medical conditions), sexual orientation, gender, gender identity, gender expression, national origin, ancestry, age, marital status, military or veteran status, medical condition, genetic information or disability (mental or physical). The Company complies with any federal, state or local law that provides for additional categories of protection.

See also the [Disability Accommodation](#) policy.

HARASSMENT

This policy also prohibits harassment based on any of these protected categories. See the [Prohibition of Harassment and Bullying](#) policy for additional detail.

RAISING CONCERNS

Cast and crew who believe they have been harassed or discriminated against, or are otherwise aware of a violation of this policy, should follow the procedures outlined in the [Speak Up](#) policy. These procedures include notifying their immediate supervisor, department head, Unit Production Manager, Human Resources and/or Employee Relations partner, or they can call the Company Guideline at 1-800-699-4870. Cast and crew in California may also contact the California Civil Rights Department at 1-800-884-1684 or online at <https://calcivilrights.ca.gov>.

The Company will not tolerate retaliation against a cast or crew member who has raised a concern in good faith or has cooperated with an investigation into a concern.

Any cast or crew member found to have violated this Equal Employment Opportunity policy will be subject to discipline, which may be termination.

PROHIBITION OF HARASSMENT AND BULLYING



Cast and crew are expected to treat others in the workplace with respect, dignity, fairness and integrity.

Cast and crew are expected to treat others in the workplace with respect, dignity, fairness and integrity and must not engage in harassing or bullying behavior. This policy encompasses behavior that is prohibited by law and behavior that, while not necessarily unlawful, nevertheless violates the Company's standards for workplace conduct. The policy applies to the workplace (both on and off Company property) and in other settings in which cast and crew may find themselves in connection with their jobs or that impact the workplace (which can occur after regular work hours or away from the regular workplace).

HARASSMENT BASED ON A PROTECTED CATEGORY

Harassing conduct that is based on a protected category is prohibited by law, whether committed by supervisors, coworkers, or third parties in the workplace, and will not be tolerated by the Company. "Protected categories" include a person's actual or perceived race (including traits associated with race, such as hair texture, hair type or protective hairstyles), religion, color, sex (including pregnancy, childbirth, breastfeeding and related medical conditions), sexual orientation, gender, gender identity, gender expression, national origin, ancestry, age, marital status, military or veteran status, medical condition, genetic information, or disability (mental or physical) and any additional category set forth in any federal, state or local law. Conduct that may

be considered as contributing to unlawful harassment when based on a protected category includes slurs, offensive jokes or teasing and disparaging comments—whether done in person or phone, by email, text, internal collaboration tools, social media, visual displays (for example, posters or articles of clothing), or otherwise.

The intent of the behavior—for example, making a joke—does not neutralize a harassment claim. Not intending to harass is not a defense. The impact of the behavior on a person is what counts. Harassing conduct can be unlawful when it is particularly egregious or when it is repeated, creating a hostile working environment and altering the conditions of employment.

Sexual harassment is one form of harassment based on a protected category and prohibited by law and this policy. Hostile environment sexual harassment can include any of the previously mentioned types of conduct as well as offensive touching, staring and stalking, gestures, violating personal space, requests for sexual favors, conversation containing sexual comments and other unwelcome advances. In addition to hostile environment harassment, sexual harassment can take the form of "quid pro quo" harassment, which includes making unwanted sexual advances and/or requests for sexual favors where submission is a condition of employment or where submission to or rejection of the advances or requests is used as the basis for employment decisions.

PROHIBITION OF HARASSMENT AND BULLYING (CONT.)



In addition to coworkers, cast and crew are prohibited from harassing customers, guests, contractors, vendors and any others with whom they interact in their work environment.

While harassment based on a protected category must meet certain legal standards to be unlawful, such as being “severe or pervasive,” these standards do not necessarily have to be met for the Company to determine that conduct has violated Company policy. The Company’s prohibition of harassment encompasses a broader range of conduct than what is prohibited by law.

BULLYING

Abusive conduct, often referred to as “bullying,” is a type of conduct that may not be unlawful but is against Company policy. Bullying need not be related to a protected category. Bullying in the workplace includes repeatedly making derogatory or insulting remarks; intentional targeted isolation; serious or repeated verbal or physical conduct that could reasonably be considered threatening, intimidating or humiliating; spreading malicious rumors; misuse of power or position; or intentionally sabotaging or undermining another’s work performance. It does not include legitimate and constructive criticism of a cast or crew member’s performance or behavior, or reasonable requests made of cast and crew.

Bullying can be physical, verbal or other conduct, including written material or pictures sent via email, text, internal collaboration tools or social media.

RAISING CONCERNS AND INVESTIGATIONS

The Company strongly encourages cast and crew to immediately speak up if they are subject to or witness conduct prohibited by this policy. Cast and crew who believe they have been subjected to discrimination, harassment or bullying by a coworker, guest, or other person in their workplace, or are otherwise

aware of a violation of this policy, should follow the procedures outlined in the [Speak Up](#) policy. These procedures include notifying their immediate supervisor, department head, Unit Production Manager, Human Resources and/or Employee Relations partner, or they can call the Company Guideline at 1-800-699-4870. Cast and crew in California may also contact the California Civil Rights Department at 1-800-884-1684 or online at <https://calcivilrights.ca.gov>.

The Company takes reports of discrimination and harassment very seriously. Supervisors who become aware of possible violations must notify Human Resources or Employee Relations. When the Company receives allegations of misconduct, it will conduct a fair, timely and thorough investigation that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. Every concern will be investigated in the manner and to the extent appropriate to the circumstances, and investigations will be conducted as confidentially and expeditiously as possible. Cast and crew have an obligation to cooperate fully and openly and honestly share information in any Company investigation.

The Company will not tolerate retaliation against a cast or crew member who has raised a concern in good faith or has cooperated with an investigation into a concern. Cast and crew who believe they have been retaliated against should immediately report the conduct, using one of the avenues outlined in the [Speak Up](#) policy.

DISCIPLINE AND OTHER REMEDIAL MEASURES

If an investigation uncovers misconduct, the Company will take appropriate remedial measures. Any cast or crew member found to have violated this Prohibition of Harassment and Bullying policy (including the prohibition of retaliation) will be subject to discipline, which may be termination.

SPEAK UP



The Company is committed to doing business in an ethical, trustworthy way that is beyond reproach, with respect for the law and the Company's values. Nevertheless, there may be occasions when cast and crew observe conduct that concerns them or that seems to violate Company policies, the [Standards of Business Conduct](#) or applicable law. Cast and crew who observe or suspect such misconduct are strongly encouraged to Speak Up to provide the Company the opportunity to address and correct the issue as soon as possible. Remaining silent about possible misconduct can allow a situation to get worse or cause additional damage to the Company and its reputation.

The Company values the help of cast and crew who Speak Up about potential concerns and does not tolerate any form of retaliation against anyone who in good faith raises concerns or participates in or cooperates with an investigation into concerns of misconduct.

SPEAK UP – ABOUT WHAT?

This Speak Up policy can be used to raise concerns about any suspected misconduct or policy or legal violations, including concerns regarding:

- Discrimination, harassment or bullying
- Fraud or improper use of Company resources
- Environmental, health and safety issues
- Unauthorized access to Company systems/information or other security lapses
- Improper disclosure of confidential information
- Violations of other Company policies
- Violations of applicable laws and regulations
- Retaliation against anyone for Speaking Up in good faith

This policy is not intended to be used to report issues that present an immediate threat to life or property. For those situations, cast and crew should refer to and follow the provisions of the [Safety, Health and Accident Prevention](#) and [Security](#) policies. It also should not be used to make accusations a cast or crew member knows are false. Doing so may lead to disciplinary measures.

SPEAK UP – TO WHOM?

The Company provides multiple avenues for cast and crew to Speak Up and raise concerns. The Company encourages cast and crew to first raise issues with their immediate supervisor, department head, or Unit Production Manager, and to do so as soon as the issue arises. If this does not resolve the issue, or if such a discussion is not productive or is not practical given the nature of the concern (including if the concern is about that person), cast and crew are encouraged to raise the issue to the next level of management.

Cast and crew also may raise a concern to Human Resources or Employee Relations. Alternatively, cast and crew may use the Company Guideline by calling 1-800-699-4870 or online at www.disneyguideline.com. Concerns to the Guideline may also be submitted anonymously.

As noted in the [Prohibition of Harassment and Bullying](#) policy, managers who become aware of possible violations of that policy must notify HR or Employee Relations.

Cast and crew are encouraged to Speak Up as soon as possible—ideally before a situation gets out of hand or causes significant damage. Cast and crew should not try to investigate the matter themselves but instead should allow the Company to assess and investigate the concern.

SPEAK UP (CONT.)



SPEAK UP – WHAT HAPPENS NEXT?

The Company takes every report of possible misconduct seriously. The Company's actions in response to a concern will depend on the nature and severity of the concern. Upon receiving a report, the Company typically will conduct an initial review to assess the concern, and where appropriate, follow up with an investigation that fits the situation. The Company will take these steps in a fair and unbiased manner and do so as confidentially and expeditiously as possible. Cast and crew have an obligation to cooperate fully—and to openly and honestly share information—in any Company investigation.

NO RETALIATION

Coming forward with questions or concerns may sometimes feel like a difficult decision, but the Company is committed to fostering an environment that encourages and protects people who Speak Up when they observe conduct that may violate our policies, the Standards of Business Conduct or applicable laws and regulations, or who participate in or cooperate with an investigation of such concerns. Accordingly, the Company strictly prohibits any form of retaliatory action against any person who in good faith uses the Company's Speak Up policy, reports misconduct, participates in an investigation, participates in any proceeding or hearing conducted by a governmental enforcement agency, or opposes actual or perceived violations of the Company's policies or applicable laws or regulations.

“In good faith” means the cast or crew member has made a genuine attempt to provide honest and accurate information, even if they are later proven to have been mistaken. The Company reserves the right to discipline anyone who knowingly makes a false accusation or has acted improperly.

Retaliation is prohibited by law in many contexts, but the Company's policy encompasses a broader range of conduct than what the law prohibits.

Examples of retaliatory action that Company prohibits include:

- Demotion, suspension, or termination of employment
- Denying benefits or taking away opportunities for advancement
- Reducing pay or hours
- Intimidating, ostracizing, making threats, and other harassing conduct
- Blocking or threatening to block from future employment in an industry
- Reassignment to a less desirable position
- Creating or allowing a work atmosphere that is hostile toward someone who has reported a concern

Cast and crew who believe they have been retaliated against—or who notice any retaliatory actions against someone else—for having raised a concern in good faith should immediately report the conduct using any of the avenues mentioned in this policy.

Any cast or crew member found to have engaged in retaliation will be subject to discipline, which may be termination.