

NBCUniversal

RESPECT IN THE WORKPLACE POLICY

Theatre Production

Our core values at NBCUniversal include doing the right thing and treating people the right way. Living up to that standard requires everyone - job applicants, co-workers, clients, freelancers, contractors and other business partners — to be treated with dignity and respect. By embracing our differences, we foster a creative and collaborative environment where everyone can do their best work. In support of our core values, the Company prohibits discrimination, harassment, bullying, and retaliation by all individuals, regardless of their position or tenure.

EQUAL EMPLOYMENT OPPORTUNITY

The Company is committed to making employment decisions — such as hiring, promotions, compensation, work assignments, training opportunities, and corrective action or discipline — based on merit, qualifications, business needs, and other job-related criteria, without regard to race, color, religion, creed, ethnicity, national origin or ancestry, citizenship or immigration status, sex (including pregnancy), sexual orientation, gender and gender identity or expression (including transgender status for those who are transitioning or have transitioned), marital status, age, mental or physical disability, genetic information, military or veteran status, or any other characteristic applicable law protects (“protected characteristics”).

DISCRIMINATION PROHIBITED

The Company prohibits discrimination against applicants and employees based on any protected characteristic. Similarly, discrimination based on the perception that an applicant or employee has a protected characteristic or associates with someone who has or is perceived to have a protected characteristic violates this policy.

HARASSMENT PROHIBITED

The Company will not tolerate harassment based on a protected characteristic of its employees or job applicants by other NBCUniversal employees or by non-employees (such as contractors, vendors, clients and guests). Similarly, the Company will not tolerate such harassment of non-employees by NBCUniversal employees. These concepts apply to conduct that occurs in the workplace or in work-related settings, or that otherwise has an impact on the work of an individual protected by this policy or on the Company’s business interests or reputation.

Harassment is a type of discrimination. It includes conduct that creates a disrespectful, intimidating, hostile, degrading, or offensive work environment for another individual based on one or more of the protected characteristics listed above. This type of mistreatment, when directed at someone who is perceived to have or who associates with someone having a protected characteristic, also may be harassment. Everyone has the right to work in an environment free of unlawful harassment including, but not limited to, sexual harassment. Because our goal is to provide an inclusive work environment for everyone, conduct that does not qualify as unlawful harassment may still violate this policy.

Examples: Harassment can take many forms. It can be verbal, physical or environmental. Identifying what is harassment involves reviewing the specific situation, but the following examples illustrate some of the types of conduct that may violate this policy:

- Derogatory, ridiculing, or demeaning comments;
- Jokes that reference a protected characteristic;
- Slurs or name-calling;
- Reliance on or expression of stereotypes;
- Non-verbal behavior, such as staring at someone in an intimidating fashion or making inappropriate gestures;
- Express or implied threats;
- Destruction or defacement of an individual’s property or workspace;

- Use of one's physical stature or presence to intimidate or interfere with others;
- Use of one's perceived stature or position within the Company to intimidate others;
- Excluding others or making them feel unwelcome;
- Displaying or sharing offensive images;
- Offensive or unwelcome comments about appearance or personal or physical characteristics; and
- Inappropriate touching or other physical contact.

This list is intended to give examples and is not exhaustive. Other types of conduct may constitute harassment under this policy or applicable law. While harassment generally involves a pattern of behavior, a single act that is sufficiently severe may still violate this policy.

These types of behavior can violate policy even if done in a joking manner and even if no intention to offend exists. Similarly, being under the influence of alcohol or other substances does not excuse behavior that violates this policy. The Company expects its leaders to set an example for others and thus should be aware of their heightened responsibilities to behave appropriately.

Sexual Harassment Prohibited

Sexual harassment falls into two categories:

- Requesting or requiring sexual favors or romantic acts or attention as the basis for an employment decision or in exchange for favorable working conditions or other benefits (often called "quid pro quo" harassment); or
- Conduct that has the purpose or effect of unreasonably interfering with an employee's work performance or of creating an intimidating, hostile, or offensive working environment due to or based on sex or gender (often called "hostile work environment" harassment).

Sexual harassment can occur regardless of the gender or sexual orientation of the individuals involved and between members of the same or opposite sex, and it does not necessarily have to be motivated by sexual or romantic desire. An individual can be a victim of sexual harassment even when not personally a target of the harassing behavior.

Examples: Sexual harassment can take the same forms as other types of harassment described above, but also may include:

- Unwelcome sexual or romantic advances or invitations;
- Unwelcome non-verbal conduct of a sexual nature, such as leering or making sexually suggestive gestures;
- Unnecessary or unwelcome physical contact, such as touching, massaging or kissing;
- Threats or demands that a person consent to sexual or romantic requests as a condition of employment, to avoid some work-related disadvantage or to obtain an employment benefit or advantage;
- Sharing or displaying explicit or sexually suggestive objects, images, or other materials anywhere in the workplace, including on any digital devices;
- Sexually suggestive jokes, derogatory or sexually degrading comments; or
- Comments about an individual's body or appearance.

This list is intended to give examples and is not exhaustive. Other types of conduct may constitute sexual harassment under this policy or applicable law. While sexual harassment generally involves a pattern of behavior, a single act that is sufficiently severe may still violate this policy.

Workplace Relationships

The Company recognizes that consensual romantic or sexual relationships may exist or develop between employees and does not prohibit them. However, perceived or actual conflicts can arise both during the relationship and after it comes to an end. This risk is greater when the relationship involves a supervisor and a subordinate, no matter how many levels separate them, or when one of the employees can influence or

determine the other's working conditions, regardless of whether they work in the same department. In these situations, the employee with greater authority or influence must report the relationship when it begins to Human Resources, and the other employee is encouraged to report the relationship as well.

Employees in romantic or sexual relationships that do not involve a disparity in authority or influence are encouraged to tell Human Resources when such a relationship develops, particularly if they work together. While the Company respects the privacy of its employees, knowing about the relationship allows it to assist in navigating any potential workplace issues that may arise.

Once a relationship is brought to the Company's attention, it will work with the employees to address any potential issues, including any actual or perceived conflict of interest. In these circumstances, the Company may change reporting relationships, transfer one or both of the employees to another position, or take other steps designed to address the situation.

BULLYING PROHIBITED

Bullying occurs when an individual behaves in an intimidating, hostile, or abusive manner toward another, regardless of whether it is based on that person's membership in a protected category. While bullying generally involves a pattern of behavior, a single act that is sufficiently severe may still violate this policy. Like harassment, bullying may be verbal, physical or environmental.

REASONABLE ACCOMMODATIONS

Disability Accommodation

The Company is committed to equal employment opportunities for qualified individuals with a known disability and provides reasonable accommodations in employment to any qualified individual with a disability. The Company provides, and is ready and willing to discuss reasonable accommodations for any such individuals to allow for the performance of the essential functions of their jobs.

What constitutes a reasonable accommodation may depend on many factors including, but not limited to, the nature of the individual's disability and the essential functions of the position.

Religious Accommodation

The Company respects the religious beliefs and practices of all employees. The Company provides and is ready and willing to discuss reasonable accommodations for an employee's sincerely-held religious beliefs or practices.

Individuals can request an accommodation due to their disability or religious beliefs from their HR representative.

COMPLAINT PROCEDURE

Raising a Concern

An individual who believes they have observed, heard of, or been the subject of a violation of this policy should report their concern to the Company as soon as possible.

The Company provides several channels for raising a concern:

- Your Human Resources representative (see attached **Appendix A**)
- Your immediate Supervisor or another Department Head
- A Producer, General Manager, or Company Manager
- The General Counsel or a senior lawyer for your production
- A member of the Fair Employment Practices Team: FairEmployment@nbcuni.com
- Visit the web portal at www.ComcastNBCUniversalListens.com
- Call the anonymous hotline 1-877-40-LISTENS (877-405-4783)

Employees have the option to remain anonymous when reporting a complaint to the Comcast NBCUniversal

Listens Helpline or Web Portal. An individual is not required or expected to raise a concern to the supervisor or other employee who has engaged in the discriminatory, harassing, retaliatory, or bullying behavior. Employees are encouraged to bring forward any concerns they may have about a potential violation of this policy in order to allow the Company to perform a prompt and thorough investigation and to promote its efforts to ensure a respectful working environment.

In addition to using NBCUniversal's internal complaint procedures, outlined above, certain state and local agencies provide resources and reporting channels. A list of these resources, along with additional location specific information, is attached as **Appendix B**.

Should you wish to use a complaint form to report a sexual harassment, please refer to the attached **Appendix C**.

Supervisor and Non-Supervisor Responsibilities

Supervisors (individuals to whom at least one other employee reports) are expected to lead by example and to ensure that the individuals they manage comply with this policy. A supervisor who witnesses an interaction that may violate this policy, who otherwise suspects or becomes aware that the policy may have been violated, or who receives a concern about potential discrimination or harassment, must report it as soon as possible through one of the channels listed above. This obligation exists even if no complaint is made, the conduct is not directly reported to the supervisor, or an individual who raises a concern requests or insists that the matter not be reported.

The Company encourages all non-supervisors to raise situations they see or hear about that may violate the policy, even if they are not directly involved or affected. Keep in mind that everyone can play a role in promoting a respectful working environment. Without receiving reports about potential concerns, the Company may be unable to take appropriate action.

INVESTIGATIONS OF POTENTIAL VIOLATIONS OF THIS POLICY

The Company promptly and thoroughly investigates concerns raised regarding violations of this policy. The purpose of the investigation is to consider the facts and circumstances surrounding the complaint and to take appropriate action based on the findings. Examples of actions that may be taken include training or coaching, counseling, impact to compensation, verbal or written warnings, suspension, and termination of employment.

While each investigation is different, the investigator typically will attempt to interview both the individual who raises the concern and any individual accused of wrongdoing. Others also may be contacted if, for example, they may have information or materials that could help the investigator reach a conclusion. Employees are required to participate when called upon, and they must be open, honest, and complete in their responses to any questions from an investigator. Written notes may be taken, but making an audio or video recording of the meeting is not permitted. If, after an interview, an employee remembers additional details that might assist the investigator, the employee should contact the investigator to provide that information. Participants in an investigation will be treated professionally and with respect throughout the process.

While the Company cannot guarantee absolute confidentiality regarding an investigation of reported concerns, those Company representatives who are involved will keep it confidential to the extent possible, consistent with the need to conduct a thorough and fair investigation and, as appropriate, resolve the concern. Confidentiality is often necessary to advance the Company's legitimate and substantial business interests in protecting the integrity of the investigation, including ensuring fairness to everyone involved, preventing potential retaliation, and protecting to the extent possible the privacy of individuals who have brought forward concerns to the extent possible. When the Company has reasonable grounds for believing these conditions exist, it may ask individuals who participate in an investigation to keep it confidential, and these individuals will be expected to follow such requests, except as described in the section below regarding communications with government agencies.

Consistent with the effort to maintain confidentiality, ensure fairness, and avoid retaliation, the investigator may not be able to answer certain questions about the investigation or share details about the conclusions the Company draws.

RETALIATION PROHIBITED

The Company strictly prohibits retaliation against any individual who, in good faith, raises a concern (internally or to an appropriate government agency or tribunal) about, or otherwise opposes, discrimination, harassment, retaliation, or other behavior this policy prohibits, even if the concern proves to be unfounded or the investigation is inconclusive. The Company will not tolerate retaliation against any individual who participates in good faith in the handling or investigation of a concern conducted by the Company or an appropriate government agency or tribunal. The Company also prohibits retaliation against an individual who requests an accommodation in good faith. Prohibited retaliation includes threats of discharge, demotion, suspension or other adverse employment action, or other harassment or intimidation as a result of reporting a concern or participating in an investigation as described above.

Any concern that an employee has experienced retaliation should be reported as described in the complaint procedure above. The Company takes all complaints of retaliation seriously and investigates them promptly and thoroughly. Any employee who engages in retaliatory conduct is subject to disciplinary action, up to and including termination of employment.

Appendix A:

FILM PRODUCTION – NBCUniversal Contacts

Human Resources:

Dee Murray, Vice President, Human Resources: (212) 664-5114

Fair Employment Practices:

Malachi Brown, Coordinator, Fair Employment Practices: (332) 284-9679

Compliance:

Jessica Budoff, Vice President, Global Dep. Chief Compliance Officer (212) 413-6627

Monica Mafud Ohara, Compliance Director, U.S. Spanish-language contact (786) 239-2018

If you would like to connect with the specific HR partner for your production, please refer to your crew list or speak with someone in your production office.

Appendix B:

State and Local Reporting Resources and Information

Addendum to the Respect in the Workplace Policy – US Based Employees

In addition to using NBCUniversal’s internal complaint procedures outlined in the Company’s Respect in the Workplace Policy, certain locations require disclosure of the following local reporting procedures and information.

Discrimination, harassment, and retaliation are prohibited by federal, state and local law.

If you believe you have been the victim of unlawful harassment or discrimination, you may raise a concern directly with NBCUniversal using the reporting channels outlined in the Company’s policy. In addition, you may report your concern to any of the applicable state and local agencies or to:

The U.S. Equal Employment Opportunity Commission (EEOC)

- 800-669-4000
- www.EEOC.gov

Location Specific Information & Reporting Resources

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CALIFORNIA

Discrimination, harassment, and retaliation are prohibited by federal law and the California Fair Employment and Housing Act.

If you believe you have been the victim of unlawful harassment or discrimination, you may raise a concern directly with NBCUniversal using the reporting channels outlined in the Company's policy. In addition, you may report your concern to the EEOC or the following state agency:

The California Civil Rights Department (CRD):

- 800-884-1684; 800-700-2320 (TTY) or California's Relay Service at 711
- <https://calcivilrights.ca.gov/>

If the CRD finds that harassment occurred, it can order monetary remedies, such as back pay, fines or damages, and other remedies such as reinstatement, promotion, or changes in policies and practices. Whether or not the Department finds probable merit in a complaint, the charging party may file a lawsuit in court upon receipt of a right-to-sue letter from the CRD.

California requires that employees attend training on the prevention of harassment and discrimination in the workplace once every second calendar year. This training is provided by the Company. For more information about this training requirement, you may visit <https://calcivilrights.ca.gov/shpt/>.

DELAWARE

Discrimination, harassment, and retaliation are prohibited by federal law, the Delaware Discrimination in Employment Act, and the Handicapped Persons Employment Protection Act.

If you believe you have been the victim of unlawful harassment or discrimination, you may raise a concern directly with NBCUniversal using the reporting channels outlined in the Company's policy.

In addition, you may file a Complaint with the Delaware Department of Labor in person at the DOL office in Dover or Wilmington. You may find more information on how to contact the Department of Labor at www.labor.delaware.gov.

ILLINOIS

Discrimination, harassment, and retaliation are prohibited by federal law and the Illinois Human Rights Act.

If you believe you have been the victim of unlawful harassment or discrimination, you may raise a concern directly with NBCUniversal using the reporting channels outlined in the Company's policy. In addition, you may report your concern to the EEOC or one of the following agencies:

The State of Illinois Sexual Harassment and Discrimination Helpline:

- 877-236-7703
- www.Illinois.gov/SexualHarassment

The Illinois Department of Human Rights (IDHR)

- 800-662-3942
- www.illinois.gov/dhr

Individuals who prove that they experienced unlawful harassment or discrimination under these laws may be entitled to remedies including, but not limited to, back pay, lost benefits, damages, front pay, reinstatement and attorney's fees and costs.

City of Chicago

Sexual harassment is illegal in Chicago. Under Chicago law, sexual harassment is defined as:

- Unwelcome sexual advances or unwelcome conduct of a sexual nature.
- Requests for sexual favors or 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, or
 - Submission to or rejection of such conduct by an individual is used as the basis for any employment decision affecting the 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; or,
- Sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual's employment position.

If you believe you have been the victim of unlawful sexual harassment, you may raise a concern directly with NBCUniversal using the reporting channels outlined in the Company's policy. In addition, you may report your concern to one of the following:

The Chicago Commission on Human Relations

- Phone: 312-744-4111 / Fax: 312-744-1081
- 740 North Sedgwick Street, 4th Floor; Chicago, IL 60654
- CCHRFilings@CityofChicago.org
- www.chicago.gov/CCHR

The State of Illinois Sexual Harassment and Discrimination Helpline:

- 877-236-7703
- www.Illinois.gov/SexualHarassment

The Illinois Department of Human Rights (IDHR)

- 800-662-3942
- www.illinois.gov/dhr

Retaliation for reporting sexual harassment is illegal in Chicago.

The City of Chicago requires that all employees participate in the following training annually:

- Sexual Harassment Prevention Training:
 - Non-Supervisory Employees: minimum of one hour
 - Supervisors and Managers: minimum of two hours
- One hour of bystander intervention training

MAINE

Discrimination, harassment, and retaliation are prohibited by federal law and the Maine Human Rights Act.

If you believe you have been the victim of unlawful harassment or discrimination, you may raise a concern directly with NBCUniversal using the reporting channels outlined in the Company's policy. In addition, you may report your concern to the EEOC or the following agency:

The Maine Human Rights Commission

- 207-624-6290
- <https://www.maine.gov/mhrc/>

NEW YORK

Harassment and retaliation are not only prohibited by NBCUniversal but are also prohibited by federal law, the New York State Human Rights Law, and the New York City Human Rights Law.

Aside from the internal process at NBCUniversal, individuals may also choose to pursue legal remedies with the following governmental entities: Division of Human Rights (DHR), in New York State Supreme Court or the Equal Employment Opportunity Commission.

If you believe you have been the victim of unlawful harassment, you may raise a concern directly with NBCUniversal using the reporting channels outlined in the Company's policy. You may also use an optional complaint form, included below, to submit your concern.

In addition, you may file a Complaint with the EEOC or one of the following agencies:

New York State Division of Human Rights

- 888-392-3644
- Confidential Hotline: 1-800-HARASS-3
- One Fordham Plaza, Fourth Floor Bronx, NY 10458
- <https://dhr.ny.gov>

New York City Commission on Human Rights

- 212-306-7450
- 22 Reade Street - First Floor, New York, NY 10007
- <https://www1.nyc.gov/site/cchr/index.page>

In addition to the resources listed above, many localities also enforce laws protecting individuals from sexual harassment and discrimination. You should contact the county, city, or town in which you live to find out if such a law exists. If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime and you may contact the local police department. Individuals who prove that they experienced unlawful harassment under these laws may be entitled to remedies including, but not limited to, reinstatement, back pay, compensatory damages, attorneys' fees, and punitive damages.

New York requires that employees attend training on the prevention of harassment and discrimination in the workplace once every year. This training is provided by the Company. For more information about this training requirement, you may visit <https://www.ny.gov/programs/combating-sexual-harassment-workplace>.

OREGON

Discrimination, harassment, and retaliation are prohibited by federal law and Oregon state law.

If you believe you have been the victim of unlawful harassment or discrimination, you may raise a concern directly with NBCUniversal using the reporting channels outlined in the Company's policy. In addition, you may report your concern to the EEOC or the following state agency:

The Bureau of Labor and Industries' Civil Rights Division:

- 971-673-0761
- <https://www.oregon.gov/boli/pages/index.aspx>

Nothing in this policy precludes any person from filing a formal grievance in accordance with a collective bargaining agreement (if applicable).

Time Limitations: Note that Oregon state law requires that any legal action taken on alleged discriminatory

conduct (specifically that prohibited by ORS 659A.030, 659A.082 or 659A.112) commence **no later than five years** after the occurrence of the violation. Other applicable laws may have a shorter time limitation on filing.

Nondisclosure or Non-disparagement Agreements: The Company will not require an employee to enter into any agreement if the purpose or effect of the agreement prevents the employee from disclosing or discussing conduct constituting discrimination, harassment, or sexual assault. An employee claiming to be aggrieved by discrimination, harassment, or sexual assault may, however, voluntarily request to enter into a settlement, separation, or severance agreement which contains a nondisclosure, non-disparagement, or no-rehire provision and will have at least seven days to revoke any such agreement.

Under this policy, a nondisclosure agreement is any agreement by which one or more parties agree not to discuss or disclose information regarding any complaint of work-related harassment, discrimination, or sexual assault.

A non-disparagement agreement is any agreement by which one or more parties agree not to discredit or make negative or disparaging written or oral statements about any other party or the Company. A no-rehire provision is an agreement that prohibits an employee from seeking reemployment with the Company and allows a company to not rehire that individual in the future.

RHODE ISLAND

Discrimination, harassment, and retaliation are prohibited by federal and Rhode Island state law.

If you believe you have been the victim of unlawful harassment or discrimination, you may raise a concern directly with NBCUniversal using the reporting channels outlined in the Company's policy. In addition, you may report your concern to the EEOC or the following state agency:

Rhode Island Commission for Human Rights

- 180 Westminster Street, 3rd Floor, Providence, RI 02903
- 401-222-2661

VERMONT

Discrimination, harassment, and retaliation are prohibited by federal law and the Vermont Fair Employment Practices Act.

If you believe you have been the victim of unlawful harassment or discrimination, you may raise a concern directly with NBCUniversal using the reporting channels outlined in the Company's policy. In addition, you may report your concern to the EEOC or the following state agency:

Vermont Attorney General's Office, Civil Rights Unit

- 109 State Street, Montpelier, VT 05609
- 888-745-9195 or 802-828-3657 (voice/TDD).
- ago.civilrights@vermont.gov
- Complaints should be filed within 360 days of the adverse action.

Each of these agencies may conduct impartial investigations, facilitate conciliation, or pursue a civil action in state or federal court. Although individuals are encouraged to file their complaint of sexual harassment through this employer's complaint procedure, an individual is not required to do so before filing a charge with these agencies. In addition, a complainant also has the right to hire a private attorney and to pursue a civil action in Superior Court.

Appendix C:

NBCUniversal Complaint Form for Reporting Sexual Harassment This form may be used by NBCUniversal employees, job applicants and non-employees (including, but not limited to contingent workers, freelancers, contractors, vendors, and guests) who wish to make a report of sexual harassment, pursuant to NBCUniversal's Respect in the Workplace Policy. Reports of sexual harassment may be made using any of the reporting channels outlined in the Respect in the Workplace Policy. You are not required to use this specific form to make a report of sexual harassment. If you believe that you have been subjected to sexual harassment and wish to use this form to make a report, you may submit it to FairEmployment@nbcuni.com. Please provide as much information as possible and attach additional pages as necessary. NBCUniversal prohibits retaliation against any person who reports sexual harassment, assists anyone making such a report, or participates in any manner in an investigation of a report of sexual harassment.	
REPORTING PARTY'S INFORMATION Name: _____ Job Title: _____ Work Address: _____ Phone: _____ Email: _____	Select Communication Preference: ☐ Email: ☐ Phone: ☐ In person
COMPLAINT INFORMATION <i>Your complaint of sexual harassment is made about:</i> Name: _____ Job Title: _____ Work Address: _____ Phone: _____ Email: _____	Relationship to You: ☐ Supervisor ☐ Subordinate ☐ Co-Worker ☐ Other (please explain): _____

Please describe what happened. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.	Is the sexual harassment ongoing? ☐ Yes ☐ No ☐ Other (please explain): _____ _____
Please list the name and contact information of any witnesses or individuals who may have information related to your report:	Have you previously reported or provided information (verbal or written) about the same or related incidents? ☐ No ☐ Yes ☐ If Yes, on what date and to whom did you complain or provide information? _____ _____

I affirm that the allegations in this report are true to the best of my knowledge, information, and belief.

Signature: _____ **Date:** _____