

## **STANDARD POLICY & PROCEDURE SP&P 400 – Human Resources – Anti-Harassment and Equal Employment**

### **1. Our Commitment (Policy Summary)**

It is the policy of The Interpublic Group of Companies to promote a fair, ethical and respectful work environment:

- To provide equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, creed, national origin, gender, sexual orientation, age, gender identity, marital status, citizenship, disability, genetic information or veteran status or any other basis prohibited by applicable federal, state or local law.
- To provide reasonable accommodation to applicants and employees with known disabilities, except where such an accommodation would create an undue hardship.
- To promote qualified employees from within the organization whenever possible.
- That no employee be subject to physical, verbal or psychological abuse by his or her supervisors, fellow employees or non-employees.
- That no employee be subject to prohibited harassment, including without limitation, sexual harassment.

Unless the Company has made an exception, all employees should sign the Interpublic Code of Conduct.

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### 3. General Issues – Employment Relationship

Unless local laws provide otherwise, employees have joined the Company freely and may terminate employment at any time with or without reason and with or without notice. Correspondingly, unless otherwise prohibited by local law, the Company has no legal obligation to continue employment and is entitled to terminate employment at any time, with or without reason and with or without notice. This is known as employment “at will.”

Except for an employee who has a written agreement for employment for a specified period of time entered into between that employee and The Interpublic Group of Companies which has been authorized by the Interpublic Management Human Resources Committee, employment by Interpublic and its subsidiaries is not for a definite term. Employment may be terminated by Interpublic or any Operating Unit with or without cause and with or without notice, at any time, in accordance with Standard Policy & Procedure 404 provided such termination does not violate any applicable law including those prohibiting discrimination on the basis of race, color, religion, creed, national origin, gender, sexual orientation, age, gender identity, marital status, citizenship, disability, genetic information or veteran status, or any other basis prohibited by applicable federal, state or local law.

### 4. Anti-Harassment

The Interpublic Group of Companies, and its subsidiaries, will provide employees, applicants for employment, interns, contractors and persons conducting business with our Company with a work environment free of prohibited harassment. Such harassing treatment is unacceptable conduct and is contrary to the Company’s policy and the basic commitment to treat one another fairly and with dignity and respect.

Prohibited harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual, including but not limited to, because of his/her race, color, religion, creed, national origin, gender, sexual orientation, age, gender identity, marital status, citizenship, disability, genetic information or veteran status and that has the purpose or effect of creating an intimidating, hostile, or offensive working environment, unreasonably interfering with an individual’s work performance or otherwise adversely affecting an individual’s employment opportunities. Harassing conduct includes but is not limited to epithets, slurs, jokes, negative stereotyping,

threatening, intimidating, bullying or hostile acts and written or graphic material placed on walls, bulletin boards, or elsewhere on the employer's premises or circulated in the workplace that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, creed, national origin, age, disability, genetic information, gender, citizenship, gender identity, or sexual orientation. Prohibited harassment can come from supervisors, fellow employees or non-employees.

Sexual harassment is one form of prohibited harassment. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender. Prohibited conduct includes unwelcome sexual advances, requests for sexual favors, and other 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. Employees should also not be subject to sex stereotyping, which occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.

Physical contact between employees should be limited to customary business practice (e.g., shaking hands). Examples of the kind of conduct employees cannot be subjected to include, but are not limited to:

- Sexually oriented or explicit remarks, including written or verbal references to sexual conduct, gossip regarding one's sex life, body, sexual activities, deficiencies, or prowess.
- Intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex.
- Physical acts of a sexual nature that are unwelcomed, such as touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body or poking another employee's body; rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted or offensive phone calls, letters, E-mail or voice-mail messages.

- Suggestive or sexually-explicit posters, calendars, photographs, graffiti or cartoons.

The foregoing behavior is prohibited when working on behalf of IPG, no matter your physical location. As such, unlawful harassment is prohibited when working on or away from the workplace premises, on personal devices or during non-work hours.

## 5. Reasonable Accommodations

IPG is committed to providing reasonable accommodations related to a disability, pregnancy, childbirth or related condition, religious belief, or a situation involving domestic violence, sexual violence or stalking, as required by local, state and federal laws. Such accommodations will be granted to allow individuals to perform essential functions of an employee's job.

Individuals that require a reasonable accommodation may request an accommodation by contacting their local HR representative or completing a Reasonable Accommodation Request Form (Appendix B or with local HR).

Individuals that require assistance in completing the Reasonable Accommodation Request Form, or wish to make the request orally, should contact their local HR representative.

IPG and its agencies will make a decision on accommodation requests on a case by case basis, consistent with local, state and federal law and subject to submission of all required documentation.

## 6. Global Human Rights Provisions

IPG is committed to human rights and equal opportunity in the workplace and shall conduct their employment practices in full compliance with applicable laws and regulations, and shall, without limitation:

- Use only voluntary labor. The use of forced labor whether in the form of indentured labor, bonded labor, prison labor, or any other behavior constituting slavery or servitude is prohibited and engaging in or the use of human or labor trafficking is prohibited.

- Employees should not be required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice without penalty.
- Comply with all local minimum working age laws and requirements and not utilize child labor. Employees shall not be under the legal minimum working age of the respective region or shall not be less than 16 years of age (whichever is higher). We only support the development of legitimate workplace apprenticeship programs for the educational benefits of younger people and will not do business with those who abuse such systems.
- Not engage in physical discipline or abuse. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.
- Pay living wages under humane conditions. All employees shall be provided with clear, written information about their employment conditions with respect to wages before they enter employment and as needed through their employment. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by applicable law be permitted without the express permission of the worker concerned. Wages and benefits paid for a standard working week meet, at a minimum, applicable legal standards.
- Not require employees to work more than the maximum hours of daily labor set by applicable local laws or policy; ensure that overtime is paid in accordance with local laws and regulations.
- Keep employee records in accordance with local and applicable regulations.

## 7. Complaint Procedure

Any employee of Interpublic or an Operating Unit who believes that he or she has been subject to discrimination or abuse, including the policy against job related harassment based on race, color, religion, creed, national origin, gender, sexual orientation, age, gender identity, marital status, citizenship, disability, genetic information, veteran status or any other basis prohibited by applicable federal, state or local law should report the alleged violation immediately to the employee's supervisor who will refer the complaint to a HR representative. If the employee believes it would be inappropriate to discuss the matter with the employee's supervisor, he or she should report it to a Human Resources representative located in the office at which the employee works, to the chief administrative officer of that office or call the Interpublic Alertline at 1-800-828-0896. Employees may also contact their local HR representative for a copy of the Harassment and Discrimination Complaint form (also Appendix A).

All supervisors who receive a complaint or information about suspected discrimination or harassment, observe what may be discriminating or harassing behavior or for any reason suspect that discrimination or harassment is occurring, are required to report such suspected sexual harassment to a HR representative. Failure to report such information will result in disciplinary action.

The complaint will be promptly and thoroughly investigated and appropriate action will be taken. An investigation to the complaint may include interviews with relevant witnesses and a review of relevant documents and recordings. The complaint will be kept confidential to the maximum extent possible (as appropriate, the Operating Unit will advise the Company's HR and/or Legal departments). Any violation of information security policy will be subject to discipline in accordance with company policy.

If Interpublic or its subsidiaries determines that an employee is guilty of harassing another employee, the appropriate disciplinary action will be taken against the offending employee, up to and including termination of employment. However, if The Interpublic Group of Companies determines that an employee has intentionally made a false accusation against another employee; appropriate disciplinary action will be taken against the offending employee, up to and including termination of employment.

This complaint procedure may also be used in the case where an employee of Interpublic or its subsidiaries believes that a non-employee, such as a vendor or client of the Interpublic and its subsidiaries, is subjecting such employee to discrimination, including the policy against job-related harassment based on race, religion, national

origin, sex, sexual orientation, age, veteran status or disability, genetic information or any other basis prohibited by applicable federal, state or local law. The Interpublic and its subsidiaries will not tolerate such conduct.

Nothing in this policy may prevent an employee from pursuing formal legal remedies or resolution through local, state or federal agencies or the courts.

## 8. Retaliation

There will be no retaliation against anyone who in good faith complains of or opposes unlawful harassment or discrimination, or that participates in any investigation. Unlawful retaliation includes any action that has an adverse impact on an individual as a result of participating or supporting a harassment or discrimination claim. Retaliatory conduct need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

## 9. Equal Employment Opportunities

Further, both Interpublic and its subsidiaries will disseminate information regarding equal employment opportunities as follows:

- All recruitment advertising will carry the phrase, An Equal Opportunity Employer.
- Government Equal Employment Opportunity notices and/or posters will be displayed appropriately.
- The Equal Employment Opportunities and anti-harassment policies will be distributed and acknowledged in orientation programs for new employees.
- Outside recruitment sources will be notified that the Interpublic Group of Companies is an Equal Employment Opportunity Employer.

The Interpublic Group of Companies, and its subsidiaries, will implement this policy by providing:

- Equal pay for equal work in accordance with the Fair Labor Standards Act.

- Identification and use of local employment sources of minority applicants such as: government employment services, private employment agencies, local schools and colleges and placement services of Community Action Programs.

Interpublic and its subsidiaries will maintain records of Equal Employment Opportunity activities and all other mandatory records as required by law.

## 10. Document Control

Date Modified	Modified By	Description of Change
	Corporate HR and Legal	Add Global Human Rights Provisions  Add Appendix A Discrimination and Harassment Complaint Form  Add Appendix B Reasonable Accommodation Form