

ANTI-HARASSMENT POLICY

Being **The Better Food Company** requires the establishment of a workplace atmosphere that is welcoming and inclusive of everyone. Maintaining that atmosphere for our team members, customers, and business partners means that all forms of harassment will not be tolerated.

All Harassment Prohibited

The Company strictly prohibits and does not tolerate harassment against team members or any other covered persons because of race, color, national origin, citizenship, ancestry, religion, gender, pregnancy, age, physical or mental disability, genetic information, military or veteran status, or any other classes or characteristics protected by applicable federal, state, or local law.

Sexual Harassment

Sexual harassment is any harassment based on someone's sex or gender. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors, or any other conduct of a sexual nature, when any of the following is true:

- Submission to the advance, request, or conduct is made either explicitly or implicitly a term or condition of employment.
- Submission to or rejection of the advance, request, or conduct is used as a basis for employment decisions.
- Such advances, requests, or conduct have the purpose or effect of creating an intimidating, hostile, or offensive work environment.

The Company will not tolerate any form of sexual harassment, regardless of whether it is:

- Verbal (for example, epithets, derogatory statements, slurs, sexually related comments or jokes, unwelcome sexual advances, or requests for sexual favors).
- Physical (for example, assault or inappropriate physical contact).
- Visual (for example, displaying sexually suggestive posters, cartoons, or drawings, sending inappropriate adult-themed gifts, leering, or making sexual gestures).
- Online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.).

This list is illustrative only, and not exhaustive. No form of sexual harassment will be tolerated, whether by team members, temporary workers, independent contractors, vendors, customers, or visitors.

Other Types of Harassment

As with sexual harassment, other types of harassment will not be tolerated in any form, including verbal, physical, visual, or online, or at any location, including at the workplace and at work-related events.

Reporting Procedure

The Company is committed to enforcing this policy against all forms of harassment. However, the effectiveness of our efforts depends largely on team members fulfilling their obligation under this policy to report inappropriate workplace conduct. If team members believe that they or someone else may have been subjected to conduct that violates this policy, they should report it promptly, and ideally within ten (10) days of the offending conduct. If team members do not report harassing conduct, the Company may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

If you are subjected to any conduct that you believe violates this policy or witness any such conduct, you <u>must</u> report the issue to one of the following:

- Your supervisor
- A higher level of management
- People Services (Human Resources)
- Legal Department
- The toll-free Compliance Help Line at 1-888-875-1167 or the Compliance Help Line Website at https://LCC-Compliance-Helpline.tnwreports.com. Reports to the Compliance Help Line may be made anonymously if you wish.

If you have not received a satisfactory response within five (5) days after reporting any incident of what you perceive to be harassment, please immediately contact People Services (Human Resources) or the Legal Department. All reports of harassment made in good faith will be welcomed and investigated, and appropriate action will be taken if it is determined that violations of this policy have occurred. Your report should be as detailed as possible, including the names of all individuals involved and any witnesses.

No Retaliation

No one will be subject to, and the Company prohibits, any form of discipline, reprisal, intimidation, or retaliation for good faith reporting of incidents of harassment of any kind, pursuing any harassment claim or cooperating in related investigations. For more information on the Company's policy prohibiting retaliation, please refer to our Anti-Retaliation Policy or contact the Legal Department.

Violations of This Policy

Any team member, regardless of position or title, whom the Company determines has subjected an individual to harassment or retaliation in violation of this policy, will be subject to discipline, up to and including termination of employment.

Administration of This Policy

The Legal Department is responsible for the administration of this policy. If you have any questions regarding this policy or questions about harassment that are not addressed in this policy, please contact the Legal Department.

Team Members Covered Under a Collective Bargaining Agreement

This policy works in conjunction with, and does not replace, amend, or supplement any terms or conditions of employment stated in any applicable collective bargaining agreement. Wherever employment terms in this policy differ from the terms expressed in the applicable collective bargaining agreement with the Company, team members should refer to the specific terms of the collective bargaining agreement, which will control.

Conduct Not Prohibited by this Policy

This policy is not intended to preclude or dissuade team members from engaging in activities protected by state or federal law, such as discussing wages, benefits, or terms and conditions of employment, forming, joining, or supporting labor unions, bargaining collectively through representatives of their choosing, raising complaints about working conditions for their and their fellow employees' mutual aid or protection, or legally required activities.

Continual Training

In support of this Anti-Harassment Policy, all team members will be required to complete periodic training on the identification, prevention, and reporting of harassment. Failure to complete required training pursuant to the Company's deadlines may result in disciplinary action, up to and including termination. Our continued compliance with this policy will ensure that Lancaster Colony remains a welcoming and inclusive company with a workplace atmosphere worthy of **The Better Food Company**.