

Global Discrimination, Harassment and Workplace Violence Policy

Values are the guiding principles that represent how we operate and help us define how we work together. They inform our actions and how we interact with each other and our customers. At Manulife, we embrace diversity, equity and inclusion and treat all individuals with dignity.

POLICY

The Company strictly prohibits discrimination, harassment and violence in the workplace. As detailed below, if you experience or observe this behavior, you should report it. The Company absolutely prohibits retaliation of any kind for good faith reports of discrimination, harassment, and violence in the workplace.

This Policy applies to all of us and is intended to address discrimination, harassment, and violence from all individuals with whom we come into contact in the workplace, including employees, contingent workers, contractors, customers, clients, and third parties.

Manulife will interpret and apply this Policy in accordance with applicable law.

OUR WORKPLACE

When we talk about our workplace, we mean all company locations as well as company-sponsored events and meetings, work travel, and any other place where you are conducting company business. We will not tolerate discrimination, harassment, or violence that takes place in the workplace or that takes place elsewhere but impacts the workplace (such as inappropriate use of social media).

HOW DO YOU RECOGNIZE DISCRIMINATION, HARASSMENT AND VIOLENCE?

In this Policy, we have included definitions and examples of discrimination, harassment, and workplace violence. The examples are not an exhaustive list; use your common sense and good judgment, as well as the information provided in our training program, to ensure your day-to-day interactions are respectful and inclusive.

Discrimination

Discrimination means treating a person differently in any stage of the employment relationship (including hiring, work assignments, training, promotions, performance management, and the administration of workplace rules) because of race, ancestry, place of origin, colour, ethnic origin, citizenship, religion or religious beliefs, creed, sex, (including pregnancy, breastfeeding, and related medical conditions), sexual orientation, genetic characteristics, military or veteran status, gender identity, gender expression, age, marital status, family status, disability, or any other ground protected by applicable law (these are called “Protected Grounds”).

Discrimination also includes creating a poisoned or hostile work environment on the basis on one or more Protected Grounds. This can happen when events, comments, actions, or other conduct

ridicule, belittle, or degrade people or groups based on Protected Grounds.

Even a single, serious event, comment, or action can create a poisoned or hostile work environment, whether it is directed at a particular individual or not.

Discrimination can exist whether or not the impact was intended.

Examples of discrimination:

- A leader does not promote an employee because of the employee's ethnic origin.
- Employees do not invite a colleague with hearing loss to a brainstorming session because they believe the accommodations required will inhibit free flowing conversations.
- A leader whose team includes an employee who is in a wheelchair chooses a team event location that is not accessible.

A colleague joking about a particular style of dress or accent associated with a religion or national origin.

Harassment

Harassment means unwelcome intimidating, annoying, hurtful, or malicious comment or conduct. It includes bullying and psychological harassment or other comment or conduct that creates an intimidating, harmful, hostile, or poisoned work environment. While harassment may involve repeated incidents or a pattern of behaviour, it can be a single act or event depending on the severity.

Examples of harassment:

- Making innuendoes, taunting, or jokes consistently directed toward an individual.
- Displaying or distributing (by mail, email, or other means) racist, derogatory, or offensive pictures or materials.
- Subtle or obvious pressure to attend outside office hours social events.
- Scolding an individual loudly or directing sarcastic or negative remarks to them in front of their team.
- Inappropriate physical contact such as massaging shoulders or unwanted hugging.

Sexual Harassment means harassment of a sexual nature or based on an individual's sex (or gender and includes unwelcome sexual attention or advances and requests for sexual favors in connection with employment decisions.

Examples of Sexual Harassment:

- Sexual advances, such as fondling, grabbing, pinching, patting, leering, brushing against, or whistling.
- A request by a leader for sexual favors in exchange for a favorable performance review or promotion.
- Comments or questions about a person's sexual orientation, sexual experiences, or gender.
- Viewing, displaying, or sharing pornographic material.

Workplace Violence

Workplace violence means using physical force or a threat against someone that causes (or could reasonably be expected to cause) physical harm, injury, or illness. It can include domestic violence that enters the workplace as well as acts that may be offences under applicable law,



such as assault, sexual offences, and stalking.

Examples of workplace violence:

- Verbally threatening to attack someone or shaking a fist in their face to intimidate them.
- Sending electronic communications threatening to injure someone.
- Throwing an object at someone.

Protect Yourself First! If you have reason to believe you are in danger of workplace violence:

- Remove yourself from the danger, if possible. You should leave without hesitation and contact law enforcement immediately.
- Encourage others who are in potential danger to remove themselves, if possible.
- Alert management – they may be able to help you and ensure the safety of other employees.
- Call the applicable emergency services and building security or property management for emergency assistance and first aid.
- Follow the Emergency Procedures specified by location (available on AskHR).

After the immediate threat of violence is addressed, reach out to Employee Relations or your HR Partner.

REPORTING

Speak up as soon as possible about any discrimination, harassment, or workplace violence that you have experienced, witnessed, or of which you have become aware.

You have options when speaking up. You can speak directly to the individual engaged in the behavior, to your manager/supervisor, Employee Relations, Human Resources. You may also report the behaviour by calling a confidential toll-free Ethics Hotline or at www.manulifeethics.com. Ethics Hotline telephone numbers can be found on the Manulife Ethics website. The Ethics Hotline provides a form for reporting on an anonymous basis.

When making a report, make sure to provide as much information as possible, including details of what happened, relevant dates, and witness names. We encourage internal reporting for an expeditious resolution and we also have provided you with external reporting options in the [final section of this policy](#).

If you are a manager or supervisor, direct all reports, and report all incidents of discrimination, harassment, or workplace violence of which you are aware, to Employee Relations.

There will be no retaliation

You can report suspected violations of this Policy without fear of any action being taken against you because you flagged a concern, participated in an investigation, or made a report. Manulife absolutely prohibits retaliation of any kind (such as termination of employment, increased workload, isolation, or a lower bonus award) for good faith reports or for participating in any investigation relating to harassment, discrimination, or workplace violence.

INVESTIGATIONS AND OUTCOMES

After receiving a report or becoming aware of a potential violation of this Policy, an objective fair, timely and thorough investigation that is reasonable in the circumstances will be conducted by Employee Relations, Investigative Services, an external investigator, or another neutral party.

Everyone has a duty to fully and truthfully co-operate in investigations of potential violations of this Policy.

Investigations are conducted with discretion and sensitivity and confidentiality is maintained except to the extent necessary to protect employees, effectively investigate, implement outcomes or otherwise as required by law.

If required, while the investigation is pending, Manulife will arrange additional security measures to protect employees while in the workplace and may implement interim measures (for example, temporary schedule changes or paid leaves of absence) to ensure a neutral and timely investigation.

After reviewing all of the evidence collected during the investigation, the investigator will make reasonable conclusions.

The nature and severity of a violation of this Policy will dictate the outcome, which in some cases might be additional training or coaching and in others discipline up to and including termination of employment with cause. The person who made the report and the person about whom the report was made will be notified of the outcome of the investigation.

Manulife will track and keep records of investigations conducted under this Policy in a manner that accords with the Company's privacy and record management policies and applicable law

LOCAL STANDARDS AND EXTERNAL REPORTING AGENCIES

Local standards may offer information about applicable local processes and/or laws, including opportunities to make a report of discrimination or harassment externally and/or details of rights/remedies/protections available under applicable legislation. For more information, click the links below.

- [Cambodia](#)
- [Canada](#)
- [China](#)
- [Hong Kong](#)
- [Indonesia](#)
- [Japan](#)
- [Malaysia](#)
- [Philippines](#)
- [Singapore](#)
- [Taiwan](#)
- [United States](#)
- [Vietnam](#)

For any questions about this Policy or for more information please contact AskHR.