

Policy Against Harassment and Discrimination

TriNet is committed to providing a safe and respectful work environment free from unlawful harassment, discrimination, and retaliation. We will take all reasonable steps to maintain a workplace that fosters positive working relationships and creates an environment where colleagues feel they belong and can be themselves at work.

Overview

At TriNet, we believe it is essential to provide a safe and respectful working environment. In addition, our Core Values provide a strong foundation for everything we do and are an integral part of the One TriNet Culture, bringing together diverse backgrounds, experiences, and ideas to create better outcomes and respect for each other. To help achieve these objectives, TriNet prohibits any form of discrimination and harassment in the workplace, including harassment based on sex or any other personal characteristic protected under federal, state, or local law. We are committed to taking all reasonable steps to prevent and address such behavior. Our commitment extends to all persons involved in our operations.

Specifics

TriNet prohibits discrimination, acts of harassment, and any other conduct that creates an intimidating, hostile, or offensive work environment, or unreasonably interferes with work performance, based on an individual's actual or perceived age, race (to include traits associated with race, including hair texture, Afro hairstyles, and protective hairstyles such as braids, locks, and twists), color, national origin, ancestry, caste, socioeconomic status, sex, gender (including pregnancy, childbirth or a medical condition related to pregnancy or childbirth), gender identity or expression, sexual orientation, religious creed, physical or mental disability, medical condition, genetic information, HIV testing or status, marital status, status as a victim of domestic violence, sexual assault, gender violence, stalking, or any other crime of violence, veteran status, military status, Civil Air Patrol status, or any other characteristic protected by federal, state, or local law. We will not tolerate such conduct, regardless of whether it takes place on Company premises or off-site, including on the internet or via social media, or at Company- sponsored social events, business travel, training sessions, or conferences.

For purposes of this policy, discrimination on the basis of "national origin" also includes discrimination against an individual because that person holds or presents a state driver's license issued specifically to those who cannot document their lawful presence in the United States. A colleague's or job applicant's immigration status will not be considered for any employment purpose except as necessary to comply with federal, state, or local law.

Colleagues and interns who violate this policy are subject to corrective action, up to and including termination of employment. In addition to any corrective action TriNet may take, up to and including termination of employment, offenders may also be personally liable in the event of litigation, for damages and attorney's fees and other costs of litigation.

SEXUAL HARASSMENT

TriNet is committed to providing a work environment that is free from sexual harassment. TriNet prohibits acts of harassment and any other conduct that creates an intimidating, hostile, or offensive work environment, or unreasonably interferes with work performance, based on sex, gender identity and sexual orientation.

Sexual harassment means sexual advances, requests for sexual favors, and/or physical, verbal, and non-verbal conduct or communication of a sexual nature that is unwanted or is unwelcome and has the effect, whether intended or not, of creating a workplace that is hostile, offensive, intimidating, or humiliating. The definition of sexual harassment under this policy is broad and while it is not possible to list all the circumstances that may constitute sexual harassment, the following are some examples of conduct or behavior that may constitute sexual harassment:

- Asking an individual to engage in sexual activity as a condition of their employment.
- Basing employment decisions on an individual's submission to or rejection of sexual conduct or sexual communication.
- Sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of a colleague's employment position.
- Romantic or sexual advances, whether they involve physical touching.
- Leering, whistling, or physically touching another's body.
- Sexual gestures.
- Display of sexually suggestive objects or images.
- Sexually explicit or offensive jokes, stories, cartoons, nicknames, slurs, epithets, and other communications of a sexual nature.
- Continuing to ask another individual to socialize after the individual has declined or rejected an invitation or otherwise objectively expressed disinterest.

Sexual harassment may occur between individuals of the same or opposite sex, as well as non-binary or transgender individuals.

Sexual harassment also can occur when a once-consensual relationship has changed or evolved so that behavior that was once welcome by an individual is no longer welcome or wanted.

OTHER KINDS AND FORMS OF HARASSMENT

In addition to sexual harassment, TriNet prohibits all other harassment based on age, race (to include traits associated with race, including hair texture, Afro hairstyles, and protective hairstyles such as braids, locks, and twists), color, national origin, ancestry, caste, socioeconomic status, gender (including pregnancy, childbirth, or a medical condition related to pregnancy or childbirth), religious creed, physical or mental disability, medical condition, genetic information, HIV testing or status, marital status, status as a victim of domestic violence, sexual assault gender violence, stalking, or any other crime of violence, veteran status, military status, Civil Air Patrol status, or any other characteristic protected by federal, state, or local law. This includes behavior that has the purpose or effect of creating an intimidating, hostile, or offensive work environment, or has the purpose or effect of unreasonably interfering with an individual's work performance.

TriNet also prohibits harassment of transgender or transitioning colleagues who wish to use the restroom facility of their choice according to their gender identity or current gender presentation.

EXAMPLES OF INAPPROPRIATE BEHAVIOR THAT MAY CONSTITUTE HARASSMENT UNDER THIS POLICY

- *Verbal.* Epithets; derogatory comments, slurs, or name-calling; inappropriate jokes, emails, or any other form of written communication, comments, noises, or remarks; repeated requests for dates, threats, propositions, unwelcome and unwanted correspondence, phone calls, texts, and gifts; or other unwelcome attention.
- *Physical.* Assault; impeding or blocking movement; physical interference with normal work or movement; unwanted and unwarranted physical contact, such as touching, pinching, patting, grabbing, brushing against, or poking another employee's body. Blocking or not allowing a colleague to use the restroom that conforms to their gender identity or current gender presentation or requiring proof of surgery or any other medical procedure.
- *Visual.* Abusive or objectively offensive images (whether in photographs, posters, cartoons, drawings, paintings, or other forms of imagery); displaying abusive or patently offensive images, writings, or objects; ogling, staring at, or directing attention to a colleague's anatomy; leering; sexual or suggestive gestures.
- *Cyber-stalking.* Proscribed harassment using electronic communication, such as e-mail, instant messaging (IM), or social media, or messages posted to a website, blog, or discussion group.

Prohibited harassment can occur in one-on-one interactions or in group settings. It is impossible to specify every action or all words that could be interpreted as harassment. Being under the influence of alcohol or other substances is not a defense to harassing conduct or behavior. Colleagues are responsible for their own conduct and are expected to be wise and sensitive to the impact of words or actions that could be misinterpreted in a professional setting as harassment. Assertions that someone “was joking” or “did not intend” a comment to constitute prohibited behavior do not excuse harassment prohibited by this policy.

ABUSIVE CONDUCT PREVENTION

TriNet colleagues are expected to perform their job duties and meet management’s performance requirements in a manner that is free from any malicious, objectively offensive, or abusive conduct, including but not limited to conduct that a reasonable person would find offensive based on any of the protected characteristics described above. Examples of abusive conduct include but are not limited to repeated infliction of verbal abuse, such as the use of malicious, derogatory remarks, insults, and epithets, verbal, or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the intentional sabotage or undermining of a person's work performance.

Make a point of paying attention to others’ reactions and stated requests and preferences, respecting their wishes, and treating them in a professional manner, regardless of any protected characteristic.

PROTECTION AGAINST RETALIATION

At TriNet, we recognize that colleagues and others may find it difficult to raise complaints about harassment, discrimination and/or other violations of this policy, so we have a non-retaliation policy meant to encourage colleagues and others to come forward with their concerns without fear of retaliation. TriNet prohibits any form of retaliation against a colleague, intern, or anyone else who makes a good faith complaint of discrimination or harassment or who participates in good faith in an investigation by the Company or its agents, or an investigation, proceeding, or hearing conducted by a state or federal agency or court. Colleagues are encouraged to review TriNet’s Non-Retaliation Policy for more information about TriNet’s prohibition of retaliation and how to report complaints of retaliation.

If you believe that you have experienced or witnessed retaliation, you should immediately report your concern using the reporting methods outlined below. Any colleague or intern who engages in retaliation will be subject to corrective action, up to and including termination of employment.

REPORTING AND INVESTIGATING DISCRIMINATION, HARASSMENT, OR RETALIATION

Individuals who believe that they or a colleague, intern, customer, or contingent worker has been subjected to or have witnessed conduct that violates this policy, must promptly report the matter and supporting facts to:

- Their supervisor.
- A senior member of management above the colleague's supervisor's level, particularly if the supervisor is alleged to have engaged in retaliatory conduct.
- The People Business Partner supporting the colleague's business area.
- A member of TriNet's People Success team; and/or
- The Business Conduct and Ethics ("BC&E") team, which can be contacted anonymously:
 - Via email at: ethics@trinet.com or chiefcomplianceofficer@trinet.com
 - Online: <http://Speakup.trinet.com>
 - Phone: 800.461.9330

Colleagues may use any of the reporting methods detailed above to report conduct that violates this policy, for themselves or on another person's behalf, or may use the complaint form available below as part of this policy. Colleagues reporting on behalf of another person may use the complaint form or the reporting methods indicated above and note that it is on another person's behalf.

Contingent workers who believe that they or others have been subjected to or have witnessed conduct that violates this policy are encouraged to utilize the complaint procedure outlined above and to report their concerns to their employer (i.e., TriNet's vendor). TriNet will partner with a contingent worker's employer to review their concerns and investigate, as necessary.

Managers who receive harassment complaints, or who learn of or suspect violations of this policy, are required to immediately report them using the reporting methods above. Violations must be reported promptly by managers upon receipt of knowledge or information of conduct that violates this policy, regardless of how the information was received or whether the information is secondhand or believed to be rumor or gossip. Managers who fail to promptly report potential violations of this policy will be subject to corrective action, up to and including termination of employment.

TriNet has an obligation to do the right thing for everyone we serve including our colleagues, contingent workers, customers, and other stakeholders. As such, all reports will be investigated promptly, thoroughly, objectively, and as confidentially as possible in a manner that provides all parties reasonable due process and reaches reasonable conclusions based on a preponderance of the evidence. Colleagues must fully cooperate in any investigation, including following instructions provided by the person conducting the investigation on behalf of TriNet. Upon completion of the investigation, TriNet will communicate its conclusion to the individual who reported and to the individual(s) about whom the complaint was made as soon as practicable.

If the investigation substantiates that a policy violation has occurred, TriNet will take appropriate corrective action, up to and including termination of employment. TriNet will also take appropriate action to address discrimination or harassment by non-colleagues in a manner designed to stop and prevent it. Our goal is to create a work environment characterized by physical and psychological safety, a sense of belonging, and respect for all – where everyone can do their best work.

LEGAL PROTECTIONS AND EXTERNAL REMEDIES

Harassment and discrimination, including sexual harassment, are not only prohibited by TriNet policy but also prohibited by federal, state and many local laws. Aside from the internal process at TriNet, colleagues may also choose to pursue legal remedies with the following governmental entities.

Equal Employment Opportunity Commission (EEOC)

The United States EEOC enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). Complaints (charges) of discrimination or harassment must be filed within certain time frames established by federal law and EEOC regulations. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred.

A colleague alleging discrimination at work can file a “Charge of Discrimination.” The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting its website at www.eeoc.gov, or via email at info@eeoc.gov.

State and Local Government Requirements and Agencies

TriNet colleagues work in multiple states and local jurisdictions across the United States and TriNet maintains offices throughout the country. In addition to federal requirements, TriNet strives to ensure compliance with all state and local agencies with additional compliance requirements related to discrimination, harassment, and how to report alleged violations. Similar to the federal EEOC, state and local agencies with jurisdiction over unlawful workplace discrimination will accept and investigate charges of unlawful discrimination or harassment at no charge to the complaining party. If sexual harassment is found, these agencies may have the power to award relief, which varies but may include requiring the company to take action to stop the harassment, or redress the damage caused, including paying monetary damages, attorney’s fees, and civil fines.

For **California** colleagues, the Fair Employment and Housing Act, codified at Government Code § 12900 et seq., and its implementing regulations, codified at Code of Regulations, Title 2, § 11000 et seq., prohibit harassment, including sexual harassment, gender harassment, harassment based on pregnancy, childbirth, breastfeeding and/or related medical conditions, race (including traits associated with race including hair texture and protective hairstyles like locks and twists) as well as harassment based on other protected characteristics.

For **California** colleagues, all colleagues are required to undergo harassment prevention training as required by applicable law. This training is provided by TriNet. For more information about this training requirement, visit <https://calcivilrights.ca.gov/shpt/>.

California The Civil Rights Department (CRD) can be reached by phone at 800-884- 1684 (voice), 800-700-2320 (TTY) or California's Relay Service at 711, by email at contact.center@dfeh.ca.gov (accommodations@dfeh.ca.gov or call 844-541-2877 for disability accommodations), or regular mail at 2218 Kausen Drive, Suite 100, Elk Grove, CA 95758. Complaints with the CRD may be filed at no cost any time within three years of the harassment.

For **Illinois** colleagues, the Illinois Human Rights Act states that you have the right to be free from unlawful discrimination and sexual harassment, meaning that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation, or any other protected class named in the Act. This prohibition applies to all employer actions, including hiring, promotion, discipline, and discharge. It is also unlawful for employers to treat people differently because they have reported discrimination, participated in an investigation, or helped others exercise their right to complain about discrimination.

Complaints may be directed to the Illinois Department of Human Rights (IDHR) at www.illinois.gov/dhr or by email to IDHR.Intake@illinois.gov. Physical offices are located at:

- Chicago Office; James R. Thompson Center; 100 West Randolph Street, Suite 10-100 (Intake Unit); Chicago, IL 60601; Phone: (312) 814-6200 / (866) 740- 3953 (TTY) / Fax: (312) 814-6251.
- Springfield Office: 535 W. Jefferson Street, 1st Floor (Intake Unit); Springfield, IL 62702. Phone: (217) 785-5100 / (866) 740-3953 (TTY) / Fax: (217) 785-5106.
- The Illinois Sexual Harassment and Discrimination Helpline can be reached at 1-877-236-7703.

For **Chicago** colleagues, in addition to internal TriNet reporting methods, employees have the right to file charges of sexual harassment with the government agencies listed below. Sexual harassment and retaliation for reporting sexual harassment are illegal in Chicago. Chicago-based colleagues are required to participate in sexual harassment and bystander training at least annually.

Chicago Commission on Human Relations 740 N. Sedgwick, 4th Floor Chicago, IL 60654 312-744-4111
cchr@cityofchicago.org

U.S. Equal Employment Opportunity Commission (EEOC) Chicago District Office 230 South Dearborn
St., Suite 1866 Chicago, Illinois 60604 321-872-9744 866-740-3953 (TTY)
<https://publicportal.eeoc.gov/Portal/Login.aspx>

Illinois Department of Human Rights 555 W. Monroe Street, Suite 700 Chicago, IL 60601 312-814-6200
312-740-3953 (TTY)

For **New York** colleagues, an individual may call 1-800-427-2773, a free and confidential hotline, to receive free legal counseling regarding any complaint of workplace sexual harassment or to submit a complaint regarding such harassment.

The New York State Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State with regard to sexual harassment, and protects employees, paid or unpaid interns, and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed at no cost either with the Division of Human Rights (DHR) or in New York State Supreme Court (which is the trial-level court in New York State). Complaints with the DHR may be filed any time within one year of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL within three years of the alleged discrimination. An individual may not file with DHR if they have already filed a Human Rights Law complaint in state court. The one year or three-year deadline is counted from the date of the most recent incident of harassment.

Contact the DHR at (888) 392-3644 or visit dhr.ny.gov/complaint for more information about filing a complaint. The DHR website, www.dhr.ny.gov, has a complaint form that can be downloaded, completed, notarized, and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

Additionally, colleagues who work in **New York City** may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450, or visit www.nyc.gov/html/cchr/html/home/home.shtml.

For **Oregon** colleagues, if you believe you have experienced or witnessed any incidents involving incidents that may violate this policy, such as alleged discrimination, harassment, or sexual assault, you are encouraged to document it as soon as possible and report it as outlined above. 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.

TriNet does not require colleagues to enter into any agreement which prevents the employee from disclosing or discussing conduct constituting discrimination, harassment, or sexual assault. A

nondisclosure agreement is any agreement where parties agree not to discuss or disclose information regarding any complaint of work-related harassment, discrimination, or sexual assault, including the amount or terms of a settlement. A non-disparagement agreement is any agreement where parties agree not to discredit or make negative or disparaging written or oral statements about any other party or the company. An individual 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.

TriNet reserves the right to modify or terminate this policy at any time. Failure to adhere to the requirements above may result in corrective action up to and including termination of employment. For additional information, please contact your People Business Partner or submit a service request via [Oracle HR Help Desk](#) for further information.

COMPLAINT FORM FOR HARASSMENT

TriNet prohibits any form of discrimination and harassment in the workplace, including sexual harassment, or harassment based on sex, or any other personal characteristic protected under federal, state, or local law. We are committed to taking all reasonable steps to prevent and address such behavior. Our commitment extends to all persons involved in our operations and prohibits unlawful

discrimination and harassment by and against colleagues, interns, job applicants, contingent workers, vendors, and others providing services in the workplace pursuant to a contract, clients, volunteers, or visitors.

If you believe that you have been subject to or have witnessed conduct that violates this policy, you should immediately report such conduct and can do so by completing this form and submitting it to the Business Conduct and Ethics team at ethics@trinet.com. TriNet has partnered with a third-party provider to allow for an alternative, confidential reporting system available to you at any time via the web <http://Speakup.trinet.com> or phone at 1.800.461.9330.

Complaints of conduct that amount to harassment under our Policy will be investigated. (See our Policy Against Harassment and Discrimination). If you are more comfortable reporting [via the online portal](#), verbally or in another manner, TriNet is still required to investigate the claim as outlined in the Policy.

COMPLAINANT INFORMATION

Name:

Home Address:

Home Phone:

Job Title:

Preferred Communication Method:

Work Address:

Work Phone:

Email:

SUPERVISORY INFORMATION

Immediate Supervisor's Name:

Title:

Work Phone:

Work Address:

COMPLAINT INFORMATION

1. Provide the following information on who your complaint of harassment is against:

· Name, Title, Work Address and Work Phone Number

· Relationship to you: Supervisor Subordinate Co-Worker Other

If your complaint is against more than one person, please provide the above information on each person.

2. Please describe the conduct or incident(s) that is the basis of this complaint and your reasons for concluding that the conduct is harassment. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.
3. Date(s) harassment occurred:
4. Is the harassment continuing? Yes No
5. Please list the name and contact information of any witnesses or individuals that may have information related to your complaint:

The last two questions are optional but may help facilitate the investigation.

1. Have you previously complained or provided information (verbal or written) about harassment at TriNet or to anyone outside of TriNet? If yes, when and to whom did you complain or provide information?

Colleagues that file complaints with TriNet might have the ability to get help or file claims with other entities including federal, state, or local government agencies or in certain courts.

2. Have you filed a claim regarding this complaint with a federal, state, or local government agency?

Yes No

Have you instituted a legal suit or court action regarding this complaint?

Yes No

Have you hired an attorney with respect to this complaint?

Yes No

I request that TriNet investigate this complaint of harassment in a timely and confidential manner as outlined in the Policy Against Harassment and Discrimination and advise me of the results of the investigation.

Signature: _____ Date: _____