

BRIGHT HORIZONS

Non-Discrimination and Anti-Harassment Policy

Bright Horizons® is committed to providing work environments and conducting company events that are free from discrimination and harassment for its employees, interns, independent contractors, customers and visitors. Harassment, discrimination, and retaliation of any kind are prohibited and will not be tolerated. This includes verbal harassment or discrimination, as well as written communications, emails, social media posts, texts or tweets.

Bright Horizons reinforces our commitment to creating respectful and inclusive environments by requiring that all employees attend diversity awareness trainings. In addition, all supervisors are required to complete training on anti-harassment and non-discrimination.

Bright Horizons is committed to addressing unlawful behavior and encourages all employees to help us meet our commitment by promptly reporting to a supervisor and/or human resources any behavior which may violate this policy. If you believe that you are the subject of or if you have witnessed harassing or discriminatory behavior (including sexual harassment) towards others, please use the Complaint Resolution Process set out below.

Prohibited actions include, but are not limited to, discrimination, harassment, based on sex (including pregnancy, childbirth, lactation, or related medical conditions), race, gender (including gender identity and gender expression), national origin or ancestry, color, religion (including religious dress and grooming practices), creed, physical or mental disability, medical condition, genetic information, marital status, registered domestic partner status, age, sexual orientation, veteran status or any other class protected by federal, state or local law, ordinance or regulation. It is also unlawful to deny family and medical care leave based on the protected classes above.

Sex Harassment

Harassment (including "sexual harassment") is unlawful and occurs when offensive conduct is made a term or condition of employment (whether explicitly or implicitly), unreasonably interferes with an individual's work performance or advancement, or creates a hostile, intimidating or offensive work environment; or when the submission or rejection of such conduct is used as the basis for employment decisions.

The victim or the harasser can be a woman or a man, or both can be the same sex. The harasser can be a supervisor, a colleague, or someone who is not a Bright Horizons' employee, such as a client or customer. A person who is not harassed directly, but is affected by the offensive conduct, can be a victim of sexual harassment. The victim does not need to suffer economic injury, adverse employment action or termination for conduct to be unlawful.

Unlawful Activities

Examples of unlawful harassment and discrimination include, but are not limited to:

- Sexual innuendoes, suggestive comments, jokes of a sexual nature, propositions, threats;
- Sexually suggestive objects or pictures, graphic commentaries, suggestive or insulting sounds, staring, leering, whistling, obscene gestures;
- Unwanted physical contact; including touching, pinching, brushing, accosting, or impeding someone's physical direction of movement or progress;
- Repeated requests for a date or sexual favors and repeated phone calls, letters, or messages which are unwelcome or intimidating in nature;
- Discussion of sexual activities or inquiries into one's sexual experiences;
- Offensive comments about a person's sex or sex stereotypes;
- Use of racial or other epithets/slurs (hate words) which make derogatory reference to or demean members of particular groups;
- Mocking the physical characteristics or mannerisms of a person who is disabled.

Complaint Resolution Process

If you are subjected to or witness discrimination or harassment, a report can be made either verbally or in writing to a supervisor; manager; human resources or directly to the VP, Human Resources Business Partnerships at 200 Talcott Avenue, Watertown, MA 02472, or through the confidential HR employee email at hrconcerns@brighthouse.com.

Your complaint should include details of each incident and the names of those involved, including witnesses. Bright Horizons adheres to confidentiality protocols to protect your identity except as required in the context of the investigation.

Upon receipt of a complaint, human resources will:

- Inform you promptly, clearly, and fully of your rights in the handling of the complaint, including the right to confidentiality.
- Conduct a fair, timely and detailed investigation of the allegations in the complaint, in order to make a determination regarding what occurred.
- Determine an appropriate remedy for the alleged harasser using Bright Horizons' corrective action process, and
- Inform the victim of the resolution.

Retaliation

Both the law and Bright Horizons prohibit retaliation against any individual who makes a complaint or participates in an investigation into allegations of unlawful discrimination or harassment, including sexual harassment.

THE UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION (EEOC)

www.eeoc.gov | (800) 669-4000 | 131 M Street, NE, Washington, DC 20507
To contact your local employment discrimination enforcement agency,
please visit www.eeoc.gov/field and search by zip code.

For California employees, contact the California Department of Fair Employment and Housing:
www.dfeh.ca.gov | (916) 478-7251 | 2218 Kausen Drive, Suite 100 | Elk Grove, CA 95758

Disciplinary Action

If a determination is made that inappropriate conduct occurred, the harasser and anyone who engaged in retaliatory conduct will be subject to disciplinary action, up to and including termination of employment.

Pay Transparency

As a federal contractor, Bright Horizons complies with the Pay Transparency Act and will not discharge or discriminate in any other manner against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions may not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with Bright Horizons legal duty to furnish information.

Legal Remedies

In addition to the rights described above, individuals may file a formal complaint of discrimination with the appropriate state or federal agency. In certain circumstances, some states allow for the harasser and/or the manager to be personally liable for damages in a civil suit brought against them.

