

Zero tolerance discrimination, harassment and retaliation

Applicability

We're committed to providing a work environment that's free of discrimination, harassment and retaliation. All acts of unlawful discrimination and harassment of or against our job applicants, employees, interns, by another employee, vendor, customer, or any third party are prohibited and will result in termination of employment. GXD also prohibits retaliation as defined below.

GXD is committed to maintaining a workplace that is respectful and courteous for all. It's GXD's policy to provide a workplace free from discrimination, harassment and retaliation because we know this enables everyone to work to the best of their abilities. We strive to hire mature, responsible adults in whom we place trust, and we expect them to treat others with the same professional regard.

To foster this environment, GXD is committed to maintaining positive work environments in all locations and levels of employment so employees can devote their full attention and best efforts to their job. Discrimination, harassment and retaliation have no place at GXD. Accordingly, GXD does not tolerate any form of discrimination, harassment or retaliation of or by any person based on any Protected Category.

"Protected Category" includes (but

is not limited to) race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, protected medical condition as defined by applicable state or local law, genetic information, or any other characteristic protected by applicable federal, state, or local laws and ordinances (referred to as "protected characteristics"). It also applies to the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics.

Examples of conduct which violate this policy, include, but are not limited to:

- Verbal conduct such as epithets, derogatory jokes, slurs or comments based on a protected category, or unwanted sexual advances, invitations or comments;
- Visual displays such as derogatory and/or sexually oriented posters, photography, cartoons, drawings or gestures;
- Physical conduct, including unwanted touching, intentionally blocking normal movement or interfering with work because of sex, race or any other Protected Category;
- Threats and demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss and offers of employment benefits in return for sexual favors;
- Retaliation for reporting or threatening to report violations of this policy; and communication via electronic media of any type that includes any conduct that is prohibited by state and/or federal law, or by GXD policy. GXD systems shall not be used to transmit messages which violate this policy.

These behaviors are unacceptable in the workplace and in any work-related settings such as business trips and GXD-sponsored social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party.

Discrimination Defined.

Discrimination under this policy means treating someone differently or denying or granting a benefit to an individual because of the individual's protected characteristic.

Harassment Defined. Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of any protected characteristic when:

Zero Tolerance Discrimination, Harassment and Retaliation Policy



- Submission to that conduct is made either explicitly or implicitly a term or condition of an individual's employment; or
- Submission to or rejection of the conduct by an individual is used as the basis for employment decisions affecting the individual; or
- The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual Harassment Defined. Sexual harassment can include all the above actions, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal, visual or physical conduct of a sexual nature when:

- Submission to that conduct or those advances, or requests is made either explicitly or implicitly a term or condition of an individual's employment; or
- Submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or
- The conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Retaliation Defined. Retaliation means adverse action taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below.

"Adverse action" includes, but is not limited to, any action that: 1) discourages an employee from reporting perceived discrimination, harassment or retaliation; 2) shun and avoid an individual who reports perceived discrimination, harassment or retaliation; 3) expresses or implies threats or intimidation that's intended to prevent an individual from reporting perceived discrimination, harassment or retaliation; and 4) denies employment benefits or opportunities because an applicant or employee reported perceived discrimination, harassment or retaliation or participated in the reporting and investigation process.

GXO policy prohibits retaliation against any employee for reporting a potential violation of this policy, filing a complaint of harassment or discrimination concerning a protected category, or testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by GXO or a federal or state enforcement agency. It's your responsibility to report any known or suspected retaliation to HR or EthicsPoint. Any report of retaliatory conduct will be promptly investigated, preserving confidentiality to the extent possible. If a report of retaliation is substantiated, appropriate disciplinary action, up

to and including termination of employment, will be taken.

Investigation Procedure

GXO cannot resolve matters that are not brought to its attention. Any person who has a complaint of or who witnesses harassment at work by anyone, including supervisors, employees or even non-employees, suppliers, customers, visitors or guests, has a responsibility to immediately bring the matter to our attention.

Reporting Instances of Discrimination, Harassment or Retaliation

If any person is subjected to or witnesses any violation of this policy, that person should immediately notify their supervisor or HR representative. If the employee feels uncomfortable bringing their concerns to these individuals, the employee may file their complaint anonymously, 24 hours a day, via EthicsPoint at **1.844.694.0719** or gxo.ethicspoint.com. Translation services are available. The person will be asked to provide details of the incident or incidents, names of individuals involved and names of any witnesses.

Supervisors must immediately refer all complaints involving harassing or other prohibited conduct to HR. Failure to do so will result in disciplinary action, up to and including termination of employment. GXO urges all employees to report any incidents of harassment or other prohibited conduct forbidden by this policy, so that complaints can be resolved quickly. Supervisors/managers should not initiate an investigation unless advised to do so by HR.