



<b>Policy Name:</b>	Policy Against Discrimination, Harassment and Retaliation/Victimization-Global							
<b>Policy Category:</b> <i>(Select One)</i>	Legal-Employment/HR							
<b>Policy Owner:</b>	Associate General Counsel – Employment							
<b>Policy Administrator:</b>	Associate General Counsel – Employment							
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**I. Purpose**

Covista is committed to providing a work environment that is free of unlawful discrimination, including harassment. Covista includes each of its companies and educational institutions, which are referred to collectively as “Covista” in this policy. Covista strictly prohibits and does not tolerate unlawful harassment against colleagues or any other covered persons because of race (including protected hair style or texture), color, religion, creed, national origin, ancestry, sex (including pregnancy), gender (including sexual orientation, gender identity, and status as a transgender or transsexual individual), age, physical or mental disability, citizenship, genetic information, past, current, or prospective service in the uniformed services, or any other characteristic protected under applicable federal, state, local, territorial and/or provincial laws in the countries in which we operate.

**Covista will not tolerate any form of discrimination or harassment that violates this policy, including misconduct that does not necessarily rise to the level of unlawful behavior.**

**II. Scope**

The harassment or discrimination proscribed by this policy applies to conduct by any person involved in Covista’s operations, including colleagues, supervisors, managers, temporary workers, agents, clients, vendors, customers, or any other third-party involved in Covista’s operations.

**III. Policy Statement**

**A. Prohibited Conduct.**

This policy prohibits verbal, physical, or visual conduct that involves discriminatory employment actions or unwelcome behavior based on an individual’s protected status. Prohibited conduct includes epithets, slurs, negative stereotypes, intimidation, and the display or circulation of hostile written or graphic materials. Discrimination, harassment, bullying, and retaliation are strictly prohibited. This policy is not limited to Covista locations and may include conduct occurring in the workplace, at Covista-sponsored events, and in any work-related setting (business travel and off-site meetings ).

Sexual Harassment

Sexual harassment is illegal and Covista has a strict zero tolerance policy against all forms of sexual harassment. Sexual harassment means any harassment based on someone’s actual or perceived 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 substantially or unreasonably interfering with a colleague's work performance by creating an intimidating, hostile, or offensive work environment.

Covista 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 request 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, etc.).

This list is not exhaustive. Sexual harassment occurs when the behavior is unwelcome. Behavior may be unwelcome in the sense that the victim did not solicit or invite it, or in the sense that the victim regarded the conduct as undesirable or offensive. Welcome behavior can quickly become unwelcome behavior. What starts off as welcome behavior (consensual joking) can cross a line and become unwelcome behavior. Also, consent can be revoked at any time. When someone experiencing sexual harassment behavior says, "stop talking to me like this", it must stop. **No form of sexual harassment will be tolerated.**

Sexual harassment is prohibited at the workplace, at Covista-sponsored events, on social media, and at any workplace or working location at which colleagues and other covered persons work. Please note that what is considered a "working environment" for purposes of this policy, is not limited to the physical location where colleagues are assigned to perform their duties.

Additional Examples of Sexual Harassment:

- Physical acts of a sexual nature, such as touching, pinching, patting, kissing, grabbing, brushing against another colleague's body, or poking another colleague's body.
- Unwanted sexual advances or propositions, such as pressure to go out on a date, asking about sexual fantasies, preferences or history, or turning work discussions into sexual topics.
- Sexually oriented gestures, noises, remarks, jokes, or comments about a person's sexuality or sexual experience.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as displaying pictures, posters, calendars, graffiti, promotional material, reading materials, or any other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.

This policy also forbids harassment based on gender regardless of whether it rises to the level of a

legal violation. Examples of gender-based harassment forbidden by this policy include (1) offensive sex- oriented verbal kidding, or teasing, (2) repeated unwanted sexual flirtations, advances or propositions, (3) verbal abuse of a sexual nature, (4) graphic or degrading comments about an individual's appearance or sexual activity, (5) offensive visual conduct, including leering, (6) offensively suggestive or obscene letters, notes or invitations, (7) offensive physical contact such as patting, grabbing, and (8) sexual favoritism.

## **B. Colleague Responsibility**

Everyone at Covista is responsible for helping maintain a workplace free from prohibited discrimination or harassment by avoiding prohibited conduct and reporting any violations. This policy applies to all colleagues, regardless of position.

## **C. Internal Complaint Procedures and Anti-Retaliation**

If a colleague feels he or she has experienced or witnessed any conduct that violates this policy, if comfortable, colleagues should tell the person to stop. Colleagues have the right to, and should, immediately notify their supervisor, any manager, or utilize the following resources offered by Covista:

- Contact the Coaching Resource Center at [crc@covista.com](mailto:crc@covista.com)
- Contact AskHR at [askHR@covista.com](mailto:askHR@covista.com)
- Contact the Office of Nondiscrimination and Access at (630) 829-0233 or [ONA@covista.com](mailto:ONA@covista.com)
- Contact Covista's Speak Up Hotline (which allows colleagues to submit concerns or complaints anonymously) by calling (800) 461-9330, texting (773) 904-1074, or by visiting [www.speakupcovista.com](http://www.speakupcovista.com)

This policy does not require reporting harassment directly to a colleague's immediate supervisor or to any individual who is creating the harassment. However, the effectiveness of our efforts depends largely on colleagues reporting inappropriate workplace conduct.

All complaints should be as detailed as possible, including the names of all individuals involved and any witnesses. Covista will directly and thoroughly investigate the facts and circumstances of all claims of perceived harassment and will take prompt corrective action, if appropriate.

Covista strictly prohibits any form of discipline, reprisal, intimidation, or retaliation for good faith reports or complaints of incidents of harassment of any kind, pursuing any harassment claim, or cooperating in related investigations. Colleagues who experience or witness any conduct they believe to be retaliatory are to immediately follow the reporting procedures stated above.

## **D. Supervisor Responsibility**

Each supervisor is responsible for maintaining the workplace free of harassment. This is accomplished by promoting a professional environment and by dealing with harassment as with all other forms of colleague misconduct. Supervisors are the first line of defense against harassment. By setting the right example, a supervisor may discourage his or her colleagues from acting inappropriately.

In addition to being subject to discipline if they engaged in harassing conduct themselves, supervisors and managers may be subject to discipline for failing to report suspected harassment that they observe

or become aware of, or otherwise knowingly allow harassment to continue. Any manager or supervisor who observes harassing conduct **must** report the conduct to the Coaching Resource Center, at [crc@covista.com](mailto:crc@covista.com) so that an investigation can be made, and corrective action taken, if appropriate.

Also, supervisors must ensure that no retaliation will result against a colleague making a harassment complaint. Supervisors and managers will also be subject to discipline for engaging in any retaliation.

#### **E. Investigation**

All reports, whether that information was reported in verbal or written form, describing conduct that is inconsistent with this policy will be investigated promptly, thoroughly, and fairly. Complaints and allegations of misconduct will be kept confidential (to the extent possible). All colleagues, including managers and supervisors, are expected to cooperate with an investigation. Failure to do so may result in disciplinary action, up to and including termination. Colleagues are expected to provide truthful information when participating in an investigation.

Once the investigation is completed and a determination is made, the complaining party will be advised that the investigation has been completed. The Company complies with the law in conducting investigations.

#### **F. Discipline**

If Covista determines that this policy has been violated, prompt remedial action will be taken, up to and including termination of employment.

#### **G. Good Faith Reporting**

The initiation of a good faith complaint of discrimination, prohibited harassment, sexual harassment or retaliation will not be ground for disciplinary or other retaliatory action, even if the allegations cannot be substantiated or the colleague was mistaken about aspects of the complaint. However, any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination.

#### **H. Confidentiality**

Covista will maintain confidentiality surrounding the investigation to the extent possible, consistent with a thorough and objective investigation, and to the extent permitted or required under applicable law.

### **IV. Legal Protections and External Remedies**

Harassment, including sexual harassment, is not only prohibited by Covista but is also prohibited by state, territorial, provincial, federal, and, where applicable, local law.

Aside from the internal process at Covista, colleagues may also choose to pursue legal remedies with their local governmental entities. For example, a colleague may contact the Equal Employment Opportunity Commission (EEOC) about filing a formal complaint. A complaint with the EEOC must be filed within 300 days of the alleged incident. Contact information for the EEOC is as follows:

United States Equal Employment Opportunity Commission (EEOC)

Website: [www.EEOC.gov](http://www.EEOC.gov)

Headquarters: 131 M Street, NE, Washington, DC 20507

1-800-669-4000  
For Deaf/Hard of Hearing Callers:  
1-800-669-6820 (TTY)  
1-800-234-5122 (ASL Video Phone)  
Email: [info@eoc.gov](mailto:info@eoc.gov)

To find your nearest EEOC office:  
<https://www.eoc.gov/field-office>

### **Local Protections**

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists.

### **Contact the Local Police Department**

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

## **V. Resources & Tools**

- Covista Colleague Handbook
- Code of Conduct and Ethics
- SpeakUp - Reporting Document

## **VI. Modifications to Policy**

Covista has the maximum discretion permitted by law to interpret, administer, change, modify, or delete this policy at any time. No statement or representation by a supervisor or manager or any other colleague, whether oral or written, can modify this policy.

## **VII. Related Information**

- CA Anti-Discrimination & Anti-Harassment Policy
- IL Anti-Discrimination & Anti-Harassment Policy
- NY Anti-Discrimination & Anti-Harassment Policy