



## **NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY**

OUTFRONT MEDIA is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, OUTFRONT MEDIA expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice and harassment.

### **Equal Employment Opportunity**

It is the policy of OUTFRONT MEDIA to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, sex, age, disability, alienage or citizenship status, marital status, creed, genetic information, height or weight, sexual orientation, veteran's status, gender identity or gender expression or any other characteristic protected by law. OUTFRONT MEDIA prohibits and will not tolerate any such discrimination or harassment.

Although the Senior Vice President, Human Resources has the overall responsibility for the implementation of this policy, every OUTFRONT MEDIA employee is expected to assist in the furtherance of this policy with responsibilities including:

1. Recruiting, hiring, training and promoting in all job classifications without regard to race, color, national origin, religion, sex, age, disability, alienage or citizenship status, marital status, creed, genetic information, height or weight, sexual orientation, veteran's status, gender identity or gender expression or any other characteristic protected by law.
2. Basing decisions on employment so as to further the principle of equal employment opportunity.
3. Ensuring that promotion decisions are in accordance with principles of equal employment opportunity by imposing only valid requirements for promotional opportunities.
4. Ensuring that all personnel actions and practices are administered in a fair, equal and consistent manner.

### **Non Discrimination Against and Accommodation of Individuals with Disabilities**

The Company complies with the Americans with Disabilities Act (ADA), the Americans with Disabilities Act Amendments Act (ADAAA) and applicable state and local laws providing for nondiscrimination in employment against qualified individuals with disabilities. We are committed to providing equal employment opportunities to all individuals, including those with disabilities. The Company is committed to engaging in an interactive process to determine the availability of a reasonable accommodation to any qualified individual who:

- requests an accommodation during the application process;
- requests an accommodation to enable him or her to perform essential job functions or gain access to company facilities; or
- asks for an accommodation to enjoy equal benefits and privileges of employment.



## NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

It is the Company's policy to, without limitation:

- Ensure that qualified individuals with disabilities are treated in a nondiscriminatory manner in the pre-employment process and that employees with disabilities are treated in a nondiscriminatory manner in all terms, conditions, and privileges of employment;
- Keep all medical-related information confidential in accordance with the requirements of the ADA and the ADAAA and retain such information in separate confidential files;
- Engage in an interactive process with applicants and employees with disabilities to determine if a reasonable accommodation exists that would allow him/her to perform the essential functions of the position, and would not create an undue hardship on the Company; and
- Notify individuals with disabilities that the Company provides reasonable accommodation to qualified individuals with disabilities, by including this policy in the Company's employee handbook.

The Company will process requests for reasonable accommodations in a timely manner and, as appropriate, provide accommodations promptly. To enact this policy, the Company has designated the HR department with the administrative responsibility for the program. Employees needing an accommodation should contact their immediate supervisor or the HR department for assistance.

### Definitions of Harassment

- a. **Sexual harassment** constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: (a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (c) such 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 may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or activity or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail); and other physical, verbal or visual conduct of a sexual nature. Sex-based harassment — that is, harassment not involving sexual activity or language (e.g., male manager yells only at female employees and not males) — may also constitute discrimination if it is severe or pervasive and directed at employees because of their sex.



## NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

- b. **Harassment on the basis of any other protected** characteristic is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, national origin, sex, age, disability, alienage or citizenship status, marital status, creed, genetic information, height or weight, sexual orientation, veteran's status, gender identity or gender expression or any other characteristic protected by law or that of his/her relatives, friends or associates, and that: (a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (b) has the purpose or effect of unreasonably interfering with an individual's work performance; or (c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through e-mail).

### Individuals and Conduct Covered

These policies apply to all applicants and employees, and prohibit harassment, discrimination and retaliation whether engaged in by fellow employees, by a supervisor or manager or by someone not directly connected to OUTFRONT MEDIA (e.g., an outside vendor, consultant or customer).

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

Any employee who engages in such harassment by any means, including in person and/or through the use of e-mail, voicemail, telephone, audio or video devices and/ or computer or hard-copy documents, will be subject to discipline, up to and including termination.

### Retaliation Is Prohibited

OUTFRONT MEDIA prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action.



## **NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY**

### **Complaint Procedure**

#### **Reporting an Incident of Harassment, Discrimination or Retaliation**

OUTFRONT MEDIA strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe they have experienced conduct that they believe is contrary to OUTFRONT MEDIA's policy or who have concerns about such matters should report their complaints to their immediate supervisor, their department head, any senior manager of the business unit, the OUTFRONT MEDIA Human Resources Department, or the OUTFRONT MEDIA Senior Vice President of Human Resources *before* the conduct becomes severe or pervasive. Individuals should not feel obligated to file their complaints with their immediate supervisor first before bringing the matter to the attention of one of the other OUTFRONT MEDIA designated representatives identified above. Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. Therefore, while no fixed reporting period has been established, OUTFRONT MEDIA strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. OUTFRONT MEDIA will make every effort to stop alleged harassment before it becomes severe or pervasive, but can only do so with the cooperation of its staff/employees.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

#### **The Investigation**

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly, thoroughly and impartially. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. Each complainant will receive a written response following the completion of the investigation which will state whether corrective action was taken. In the usual course OUTFRONT MEDIA will endeavor to complete investigations within a reasonable period of time. Where the circumstances are more complicated, OUTFRONT MEDIA will endeavor to complete the investigation within forty-five days and will notify the complainant if they are unable to do so.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.



## **NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY**

### **Responsive Action**

Misconduct constituting harassment, discrimination or retaliation will be dealt with promptly and appropriately. Responsive action may include, for example, training, referral to counseling, monitoring of the offender and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, prospective reduction of wages, demotion, reassignment, temporary suspension without pay or termination, as OUTFRONT MEDIA believes appropriate under the circumstances.

### **Additional Information About These Policies**

Individuals who have questions or concerns about these policies should talk with a member of the OUTFRONT MEDIA Human Resources Department.

Finally, these policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions in order to avoid allegations of harassment. The law and the policies of OUTFRONT MEDIA prohibit disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions, privileges and perquisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to complement and further these policies, not to form the basis of an exception to them.