



## Non-Harassment, Antidiscrimination & Non- Retaliation Policy

### WHAT IS THIS POLICY FOR?

To notify associates of their rights to be free from workplace discrimination and retaliation. Applicable state and local laws may require expanding the list of protected categories.

### WHO IS THIS POLICY FOR?

This policy applies to all Belden associates, subsidiaries and affiliates in all business platforms, giving due consideration to local laws.

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## Overview

Belden is committed to maintaining a work environment that is free of unlawful discrimination and harassment. In keeping with this commitment, Belden prohibits harassment of applicants or employees by anyone, including managers, co-workers and other employees working for the organization, temporary workers, suppliers, subcontractors, or clients of Belden.

Prohibited Conduct includes unlawful harassment and discrimination based on an applicant's or employee's age, race, color, ancestry, citizenship status, religion, national origin, physical or mental disability, covered veterans status, sex, marital status, sexual orientation or other status protected by law. Belden prohibits any form of unlawful harassing conduct that affects tangible job benefits, interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment. Violation of this policy shall be considered grounds for disciplinary action, up to and including termination of employment.

**Harassment** consists of unwelcome conduct, whether verbal, physical, or visual towards an individual based on age, race, color, ancestry, citizenship status, religion, national origin, physical or mental disability, covered veteran status, sex, marital status, sexual orientation or other status protected by law.

**Sexual Harassment** consists of unwelcome sexual advances, requests for sexual favors, and other physical, verbal, or visual conduct of sexual nature. Such conduct constitutes sexual harassment when:

- Submission to the conduct is an explicit or implicit term or condition of employment



- Submission to or rejection of the conduct is used as the basis for employment decisions affecting the individual
- The conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Sexual harassment may include explicit sexual propositions, sexual innuendo, suggestive comments, sexually oriented "kidding" or "teasing," "practical jokes," jokes about gender-specific traits, foul or obscene language or gestures, displays of foul or obscene electronic, printed or visual material, and unwelcome and/or inappropriate physical contact.

### *Non-retaliation*

The Company will not tolerate any retaliation against an applicant or employee for filing a complaint, or who has assisted another employee in reporting a complaint, or who participated in an investigation. Any instance of retaliatory conduct that is found to violate this policy shall be considered grounds for disciplinary action, up to and including termination of employment.

### *Reporting Channels*

Any of the following reporting channels are deemed appropriate for the initial reporting of perceived issues of violation of this policy.

- Your Manager
- Human Resources
- Our Convercent hotline

### *Reporting*

Belden can only remedy issues that are made known to us.

Human Resources has the responsibility to investigate all complaints thoroughly and promptly. If a manager receives a report of harassment or discrimination or otherwise becomes aware of conduct that may violate this policy, they should inform Human Resources

If any associate believes they have been subjected to any form of discrimination in violation of this policy, they should share their questions, concerns, suggestions, or complaints with someone who can address them properly. In many cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to utilize any of the other appropriate reporting channels listed above.

The complaint should be specific and should include the names of the individuals involved and the names of any witnesses.

The Company takes such complaints extremely seriously and investigates promptly so the appropriate corrective action can be taken to eliminate any unacceptable conduct.



### *Confidentiality*

Confidentiality will be maintained to the extent possible, except where disclosure is required in order to conduct an investigation, take remedial action and as may be required by applicable law. Belden cannot guarantee complete anonymity or confidentiality.

**Disability** - Information about an employee's disability, need for accommodation and related medical information will be kept confidential, except for information that may need to be shared on a need-to-know basis, including in the following circumstances:

- Managers involved in the accommodation process may be informed regarding restrictions on work duties and any accommodation needed
- Safety personnel may be informed if/when the employee's condition requires first aid or emergency treatment; and
- Government officials investigating legal compliance may be informed of the disability.

