



# Working Together

POLICY OVERVIEW



Supporting a Harassment-Free Workplace

## Equal Opportunity and Anti-Harassment Policies



Equal opportunity and affirmative action are legal requirements, but they also support our commitment to promoting workforce diversity and developing employee potential.

### EQUAL OPPORTUNITY AND DIVERSITY POLICY

The Company is committed to employ, train, promote and compensate individuals based on job-related qualifications and ability without regard to race, color, gender, gender identity, genetic information, disability, sexual orientation, religion, national origin, age, veteran or marital status. This policy encompasses all aspects of employment from recruitment to termination and is based on the Company's strong commitment to a work environment that is free from discrimination and that respects the dignity of every employee.

We ensure the implementation of our Equal Opportunity Policy through an aggressive affirmative action program. We continually review our employment-related activities to be certain that our actions reflect our policies, and that they are in compliance with federal and state laws and regulations.

THE **DIVERSITY**  
ADVANTAGE

The successful implementation of this policy requires the understanding and cooperation of all employees. Equal opportunity and affirmative action are legal requirements, but they also support our commitment to promoting workforce diversity and developing employee potential.

## Our Equal Opportunity Commitment

- Recruitment activities are many, varied and inclusive.
- Selection guidelines are reasonable, objective and job-related.
- On-the-job and formal training programs are available to all employees.
- Promotional opportunities are posted and communicated via Company publications.
- Salary increases and bonuses are based on merit.
- Financial contributions are made in a non-discriminatory manner to support community organizations and programs.

## Company Action Steps

If the Company determines that inappropriate conduct has occurred, we will take disciplinary action, up to and including termination, if warranted.

## ANTI-HARASSMENT POLICY

The Company is committed to providing our employees with a work environment that is free from all types of harassment, including those based on race, color, gender, gender identity, genetic information, disability, sexual orientation, religion, national origin, age, veteran or marital status.

Any form of workplace harassment based on an employee's race, color, gender, gender identity, genetic information, disability, sexual orientation, religion, national origin, age, veteran or marital status is illegal and will not be tolerated.

## The Definition of Harassment

Harassment is defined as any conduct, verbal or physical, which has the intent or effect of unreasonably interfering with an individual's

or group's work performance, or which creates an intimidating, hostile or offensive work environment. Examples of harassing behavior may include:

- derogatory comments based on age
- willful, unequal treatment because of sexual orientation
- deliberate interference with the work of a disabled employee
- repeated humiliation of an employee because of race, color or gender

## When Harassment is Sexual

Sexual harassment, a form of sex discrimination, is defined as any "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature" that take place under any of the following circumstances:

- submission to or rejection of such advances, requests or conduct is made an express or implicit condition of employment or as a basis for employment decisions; or
- submission to or rejection of such advances, requests or conduct have the effect of interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Harassment and discrimination aren't subjects people want to talk about. But they're topics we all must address.

## Examples of Sexual Harassment

While it is not possible to list all of those circumstances that constitute sexual harassment, the following are examples of conduct which, if unwelcome, may constitute sexual harassment: sexual jokes, conduct, advances or gossip; displaying sexually suggestive objects, pictures or cartoons; leering at or brushing against another employee's body; sexual gestures; suggestive or insulting comments; inquiries or discussions into an employee's sexual activities or experiences; assault or coerced sexual acts; and obscene, profane or sexually oriented messages sent via electronic mail, Hantalk voice messaging, the Intranet or the Internet.

## Company Action Steps

Sexual harassment or hostile environment conduct committed by employees, vendors,

customers or clients of the Company is unlawful and will not be tolerated. We will investigate any alleged violations of this policy promptly, including interviewing the involved parties and witnesses. The investigation will remain as confidential as possible. When the investigation is complete, we will convey the results of that investigation, to the extent appropriate, to the person filing the complaint and the person alleged to have committed the conduct. The Company will implement steps to remedy the situation and prevent future incidents, up to and including termination of the at-will employment of any employee found to have violated this policy. Keep in mind that it is unlawful to retaliate against anyone who submits a harassment complaint or participates in an investigation.

## EMPLOYEE ACTION STEPS

If you feel you have witnessed or have been subject to harassment or retaliation, please bring the matter to the Company's attention immediately. Your actions will remain as confidential as possible.

- > Employee Relations and Workforce Diversity: e-mail to [USEmployeeRelations@jhancock.com](mailto:USEmployeeRelations@jhancock.com)
- > Lee Blackwell, Director, Employee Relations, at (617) 572-8350 or [lblackwell@jhancock.com](mailto:lblackwell@jhancock.com)

You may also file a complaint with either or both of the following government agencies:

### All U.S.-Domiciled employees may contact:

- > The United States Equal Employment Opportunity Commission (EEOC).  
State office locations can be found by visiting: [www.eeoc.gov](http://www.eeoc.gov)

### Massachusetts-based employees may contact:

- > The United States Equal Employment Opportunity Commission (EEOC)  
John F. Kennedy Federal Building, Government Center Boston, MA 02203  
Phone: (617) 565-3200 [www.eeoc.gov](http://www.eeoc.gov)
- > The Massachusetts Commission Against Discrimination (MCAD)  
One Ashburton Place, Room 601 Boston, MA 02108  
Phone: (617) 727-3990 [www.mass.gov/mcad](http://www.mass.gov/mcad)

Harassment via electronic mail, voice messaging, the Intranet and the Internet is prohibited under the Company's voice-mail and electronic mail policies, as well as under both state and federal law.

(Please refer to these policies for further details.)

## To All U.S.-Based Employees:

The Company has long recognized that providing equal employment opportunities for all individuals is more than a legal and moral necessity, it's also a sound business practice.

As a Company, we are committed to maintaining a bias-free work environment, prohibiting sexual and other forms of discriminatory harassment, and respecting the dignity of every employee.

Our Equal Opportunity and Anti-Harassment Policies are published in this brochure. Please take a moment to read each of them carefully. You are expected to comply with all aspects of these policies as a condition of your continued at-will employment.

If you have questions regarding our position on a bias-free workplace, contact Lee Blackwell, Director, Employee Relations at (617) 572-8350 or [lblackwell@jhancock.com](mailto:lblackwell@jhancock.com).



SVP, Human Resources

Equal Opportunity/Anti-Discrimination Policy  
For internal use only – not for use with the public. 12/09

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