

## Prevention of Discrimination and Harassment, 1204

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### 1.0 POLICY OVERVIEW, PURPOSE AND SCOPE

OneMain (the "Company") is committed to providing a diverse and inclusive work environment where all individuals are treated with respect and dignity, offered equal employment opportunities and safeguarded from discrimination, including harassment and retaliation.

This policy and the [Code of Business Conduct and Ethics, 6101](#), define the principles and guidelines that govern the prevention and correction of any discrimination or harassment in the Company's work environment.

Any team member found to have engaged in any form of discrimination, harassment or retaliation in violation of this policy is subject to appropriate corrective action, up to and including termination of employment.

### 2.0 RELATED POLICIES, PROCEDURES, STANDARDS AND FORMS

This policy assumes a familiarity with the following:

POLICY/PROCEDURE/STANDARD/FORM	Reference	POLICY/PROCEDURE/STANDARD/FORM	Reference
Code of Business Conduct and Ethics	<a href="#">6101</a>	Social Media and Online Reviews	<a href="#">7220</a>
Diversity and Inclusion	<a href="#">1001</a>	Whistleblower Response and Protection	<a href="#">6004</a>
Human Resources Programs	<a href="#">1203</a>	Employment Dispute Resolution (EDR) Program	<a href="#">Link</a>
Reporting Ethics and Compliance Concerns Policy	<a href="#">6236</a>	Leadership Attributes	<a href="#">Link</a>

### 3.0 POLICY REQUIREMENTS

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### 3.11 Legal Protections

#### 3.1 EQUAL EMPLOYMENT OPPORTUNITY

All team members are expected to comply with applicable laws, regulations and policies regarding equal employment opportunity and fair employment practices.

- A. The Company prohibits discrimination and harassment on the basis of age, color, disability, ethnicity, family or marital status, gender identity or expression, genetic or medical history, immigration status, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran or military status, among other dimensions of diversity or as prohibited by law. This policy extends to every phase of the employment relationship, including recruiting, hiring, training and development, promotions, compensation, benefits, transfers, terminations and Company-sponsored educational, social and recreational programs.
- B. Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as virtual or remote work arrangements, electronic communications on work or personal devices, business trips, internal or external business meetings and business-related social events.
- C. Discrimination based on any of the above categories is not tolerated and is cause for corrective action up to and including termination of employment.

#### 3.2 HARASSMENT

The Company defines harassment as conduct that demeans, offends or shows hostility toward an individual because of a protected characteristic as defined in [Section 3.1 Equal Employment Opportunity](#). Every instance of harassment is unique to those experiencing it. Whether conduct amounts to a violation of this policy prohibiting harassment is to be viewed from the standpoint of a reasonable person with the same protected characteristics.

Examples of what may, if unwelcome and severe or pervasive, constitute harassment include, but are not limited to:

- Bullying, yelling or name calling
- Offensive religious or political statements
- The use of racial or ethnic slurs
- Jokes or derogatory remarks
- The use of insults
- Threats or hate speech
- Offensive or derogatory literature
- Derogatory or offensive pictures, banners, flags, posters or signs
- Graphic or offensive work attire
- Physical aggression
- Offensive, sexist or racist media such as videos, songs and lyrics, cartoons, texts, emails, instant messaging, social media posts or other media as defined in [Social Media and Online Reviews, 7220](#)

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### 3.3 SEXUAL HARASSMENT

Sexual harassment, like other forms of harassment based on protected characteristics, is illegal and is not tolerated by OneMain. All workers have a legal right to a workplace free from sexual harassment and may enforce this right by filing a complaint internally with OneMain, or with a government agency charged with enforcing federal, state or local antidiscrimination laws.

Sexual harassment is a form of sex discrimination. The prohibition against sexual harassment applies equally to all individuals regardless of their sex or gender identity. Sexual harassment includes harassment where the harasser and the victim are of the same or different sexes or gender identities. Sexual harassment also includes harassment on the basis of sexual orientation, self-identified or perceived sex, gender expression, gender identity and transgender status.

- A. Sexual harassment consists of unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when:
  - Submission to such conduct is made a term or condition of employment.
  - Submission to or rejection of such conduct is used as a basis for employment decisions.
  - Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, offensive or hostile work environment.
- B. Forms of sexual harassment include, but are not limited to, the following:
  - Verbal harassment, such as unwelcome comments, jokes, pranks or slurs or derogatory statements of a sexual nature.
  - Physical harassment, such as unnecessary, unwanted or offensive touching or impeding or blocking movement.
  - Visual or virtual harassment, such as derogatory or offensive posters, texts, emails, instant messaging, social media posts and pictures, digital images and emojis, cards, cartoons, graffiti, drawings or gestures.
- C. Specific examples of sexual harassment include, but are not limited to:
  - Physical assaults of a sexual nature, such as:
    - Touching, pinching, patting, grabbing, brushing against or poking another team member's body.
    - Rape, sexual battery, molestation or attempts to commit these assaults.
  - Unwanted sexual advances or propositions, such as:
    - Requests for sexual favors accompanied by implied or overt threats concerning the victim's job performance evaluation, a promotion or other job benefits or detriments.
    - Subtle or obvious pressure for unwelcome sexual activities.
    - Sexually-oriented gestures, noises, remarks, jokes or comments about a person's sexuality or sexual experience which create a hostile work environment.
- D. Sexual or discriminatory displays, audio or publications anywhere in the workplace, such as:
  - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers, cellphones or other mobile devices and sharing such displays while in the workplace.

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- Sharing sexual or offensive materials in text messages or other social media in the workplace.
  - Playing audio messages, music or ringtones with sexually suggestive or offensive language or lyrics.
- E. Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as, but not limited to:
- Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job.
  - Sabotaging an individual's work.
  - Bullying, yelling or name-calling.

### 3.4 THIRD-PARTY HARASSMENT/BYSTANDER INTERVENTION

The Company does not tolerate harassment of its team members by customers, contractors, consultants, vendors or other third-parties who do business with OneMain. Team members are required to report any instances of such harassment in accordance with [Section 3.6 Reporting Requirements](#). Any non-team member who engages in conduct that is prohibited by this policy is subject to termination of their temporary assignment, contract or relationship with the Company.

A team member who witnesses behavior that violates this policy may, in addition to utilizing the above internal complaint procedure and depending on the circumstances and their comfort level, use the following bystander intervention methods:

- Interrupt the harassment by engaging with the victim to stop the behavior;
- Ask another party present to intervene;
- Confront the wrongdoer and state the behavior is inappropriate; and/or
- Check in with the victim after the incident to see how they are feeling and let them know how to report the behavior by utilizing the Company's internal complaint procedures.

### 3.5 RETALIATION PROHIBITED

- A. The Company prohibits retaliation against team members who report discrimination or harassment or who engage in any other protected activity as described below or in applicable laws. Such retaliation is unlawful under federal, state and (where applicable) local law.
- B. A team member who feels they have been retaliated against is required to report such conduct to their manager, Human Resources at 1-800-804-8502, the accused's manager or the Ethics Line at 855-571-0886.
- C. Retaliation may be any action that is punitive or that deters a team member from coming forward to report perceived discrimination or harassment. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation.
- D. Any individual who has engaged in "protected activity" is protected under the law. Refer to [Whistleblower Response and Protection, 6004](#) for more information.
- E. Protected activity includes the following actions by a team member:
- Filed a complaint of discrimination or harassment, either internally or with any anti-discrimination agency.

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- Testified or assisted in a proceeding or investigation involving discrimination or harassment.
  - Opposed harassment by making a verbal or informal complaint to management or by simply informing a manager of harassment.
  - Complained that another team member has been discriminated against or harassed.
- F. Any team member who is found to have retaliated against an individual in violation of this policy may be subject to corrective action, up to and including termination of employment.
- G. Regardless of legal definitions, the Company expects everyone in the workplace to interact with one another in an inclusive, professional and respectful manner.

### 3.6 REPORTING REQUIREMENTS

- A. Any team member, who believes they are subjected to (or a witness to an act of) harassment, discrimination or retaliation is required to report this immediately to the appropriate manager in their chain of command (excluding the person accused of discrimination, harassment or retaliation), to Human Resources at 800-804-8502 or [HRConnect@omf.com](mailto:HRConnect@omf.com) or to the EthicsLine, OneMain's confidential third-party servicer at 855-571-0886 or [onemain.ethicspoint.com](http://onemain.ethicspoint.com).
1. Team members are expected to contact HRConnect at 800-804-8502 or [HRConnect@omf.com](mailto:HRConnect@omf.com) in any matter left unresolved using the normal chain of command or the EthicsLine.
  2. The Company requires team members to bring forward all issues related to this policy and does not tolerate retaliation against team members who come forward.
  3. Managers who become aware of any incidents of harassment, discrimination or retaliation are required to report this through their chain of command and to Human Resources at 800-804-8502 or [HRConnect@omf.com](mailto:HRConnect@omf.com).
  4. Corrective action, up to and including termination, may occur against managers who knowingly allow such behavior to continue.
- B. The Employee Dispute Resolution (EDR) process is available to all team members for use in resolving work-related concerns, including discrimination, harassment or retaliation. Refer to [Human Resources Programs, 1203](#) for more information.
- C. The [Reporting Ethics and Compliance Concerns Policy, 6236](#) provides additional direction on reporting acts of discrimination, harassment, retaliation and policy or law violations.

### 3.7 INVESTIGATIONS

The Company conducts a prompt and impartial investigation of all complaints.

- A. All team members are required to cooperate fully and honestly with any investigation.
- B. All information received is treated confidentially to the extent reasonably possible.
- C. Team members are expected to maintain confidentiality regarding an investigation to prevent destruction or fabrication of evidence or testimony.
- D. The Company does not tolerate team members confronting those involved in the investigation.

### 3.8 CORRECTIVE ACTIONS

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Any team member who violates this policy is subject to appropriate disciplinary action.

- A. Remedies include corrective action, training, demotion, transfer or termination of employment, depending on the circumstances of the situation.
- B. If warranted by the circumstances, the Company may place an alleged offender on suspension pending the outcome of the investigation.
- C. Sexual harassment is not only prohibited by OneMain but is also prohibited by state, federal and (where applicable) local law. Aside from the internal process at OneMain, team members may also choose to pursue legal remedies with governmental entities. While a private attorney is not required to file a complaint with a governmental agency, team members may choose to seek the legal advice of an attorney.
- D. State law may contain additional sexual harassment provisions depending on where a team member resides.
- E. The United States Equal Employment Opportunity Commission (EEOC) enforces federal antidiscrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. §2000e et seq.).
- F. 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.

### 3.9 QUESTIONS

Direct questions regarding this policy to HRConnect at 800-804-8502 or [HRConnect@omf.com](mailto:HRConnect@omf.com).

### 3.10 TRAINING

In support of creating equal employment opportunities and a harassment-free workplace, the Company is committed to providing its team members with training on employment practices and laws.

- A. All team members are required to read and comply with the [Code of Business Conduct and Ethics, 6101](#) annually and complete scenario-based training every other year.
- B. EthicsLine awareness posters are provided to all locations.
- C. Team members are provided periodic information emphasizing policies against discrimination and harassment and the reporting requirements.
- D. All leadership and team members are to manage all interpersonal relationships with high integrity per the [Leadership Attributes](#). Development courses for each of the [Leadership Attributes](#) are found on MainStreet.
- E. All first-time leaders and newly hired leaders are required to successfully complete Anti-Workplace Harassment training covering discrimination, harassment and workplace violence prevention within 120 days of hire or promotion.
- F. All team members and leaders are required to complete diversity training.

### 3.11 LEGAL PROTECTIONS

Title VII of the Civil Rights Act of 1964: The Equal Employment Opportunity Commission (the "EEOC") enforces federal anti-discrimination laws, including Title VII of the Civil Rights Act of 1964. An individual can file a complaint with the EEOC anytime within 300 days from the most recent incident of harassment. A complaint must be filed with the EEOC before you can file in federal court. Federal courts may award remedies if discrimination is found to have occurred.

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New York State Human Rights Law (the "NYSHRL"): The NYSHRL applies to all employers in New York State with four or more employees and protects employees paid or unpaid interns and third parties, regardless of immigration status. A complaint alleging violations of the NYSHRL may be filed either with the New York State Division of Human Rights (the "DHR") or in New York State Supreme Court. Complaints of sexual harassment may be filed with the DHR within three years of the harassment. If an individual does not file a complaint with the DHR, they can bring a lawsuit in state court under the NYSHRL within three years of the harassment.

The DHR will investigate your complaint. If it is ultimately found that harassment has occurred, remedies may include monetary and punitive damages, attorneys' fees, civil fines or ordering the employer to take action to stop the harassment. The DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458, (718) 741-8400. For more information about filing a complaint with the DHR, visit [www.dhr.ny.gov](http://www.dhr.ny.gov). Individuals may also call the DHR sexual harassment hotline at 1(800) HARASS3 for more information about filing a sexual harassment complaint.

New York City Human Rights Law: Employees who work in New York City may file complaints of sexual harassment or discrimination with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit [www.nyc.gov/html/cchr/html/home/home.shtml](http://www.nyc.gov/html/cchr/html/home/home.shtml).