



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

### **EFFECTIVE DATE:**

05/01/2018

### **SCOPE:**

This Non-Discrimination and Anti-Harassment Policy (the “policy”) applies to all employees of Light & Wonder, Inc. and its subsidiaries in the United States (“Light & Wonder, Inc.” or the “Company”).

### **PURPOSE:**

Light & Wonder, Inc. embraces diversity at all levels of the company and is committed to maintaining a work environment where all employees have the opportunity to develop and contribute to their full potential while achieving our business goals. Each individual has the right to be treated with respect and work in a professional environment that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, as set forth in greater detail in this policy, Light & Wonder, Inc. expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice and illegal harassment. Appropriate disciplinary action, up to and including termination of employment, may be taken against any employee who violates this policy.

### **POLICY:**

#### **EQUAL EMPLOYMENT OPPORTUNITY**

Equal Employment Opportunity has been, and will continue to be, a fundamental principle at Light & Wonder, Inc., where employment is based upon personal capabilities and qualifications without discrimination or harassment because of race, color, national origin, religion, sex, age, disability, pregnancy, sexual orientation, gender identity, or protected veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations. Light & Wonder, Inc. prohibits and will not tolerate any such discrimination or harassment.

This policy of Equal Employment Opportunity applies to all policies and procedures relating to recruitment and hiring, compensation, benefits, termination and all other terms and conditions of employment. The Company will provide reasonable accommodations to a qualified individual with a disability who has made the Company aware of his or her disability, provided that such accommodation does not constitute an undue hardship on the Company. Employees with a disability who believe they need a reasonable accommodation to perform the essential functions of their job should contact the Human Resources department.

For more information about Light & Wonder, Inc.’s commitment to these principles, please see the Light & Wonder, Inc. Affirmative Action and Equal Employment Opportunity Policy Statement.

### **HARASSMENT**

#### **Definitions of Harassment**

- a. Sexual harassment constitutes discrimination and is illegal under federal, state and local laws and is strictly prohibited. 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: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment; (ii) submission to or rejection of such conduct by an individual is used as



the basis for employment decisions affecting such individual; or (iii) 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 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, social media and other electronic communications); 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.

- 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, age, disability, pregnancy, sexual orientation, gender identity, or any other characteristic protected by local, state, or federal laws, rules, or regulations or that of his/her relatives, friends or associates, and that: (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) 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 posting on walls, voicemail, e-mail or any social media).

#### **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 Light & Wonder, Inc. (e.g., an outside vendor, consultant or customer).

Conduct prohibited by these policies will not be tolerated and 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.

#### **Retaliation Is Prohibited**

Light & Wonder, Inc. 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 the Light & Wonder, Inc. Code of Business Conduct and, like harassment or discrimination itself, will be subject to disciplinary action.



## COMPLAINT PROCEDURE

### REPORTING AN INCIDENT OF HARASSMENT, DISCRIMINATION OR RETALIATION

Light & Wonder, Inc. 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 Light & Wonder, Inc.' policy or who have concerns about such matters are strongly encouraged to file their complaints with their immediate supervisor, Human Resources, or through the Light & Wonder, Inc. Ethicspoint hotline (1-888-475-9507 or click [here](#) for the [Ethicspoint](#) website) before the conduct becomes severe or pervasive. Employees making reports through the Ethicspoint hotline have the option of remaining anonymous. Individuals should not feel obligated to file their complaints with their immediate supervisor first before bringing the matter to the attention of Human Resources or filing a complaint through Ethicspoint.

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, Light & Wonder, Inc. strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. Light & Wonder, Inc. will exercise reasonable care to stop alleged harassment before it becomes severe or pervasive but can only do so with the cooperation of its 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. Advising the offender that his or her behavior is unwelcome and/or requesting that it be discontinued shall not constitute a complaint under this procedure even if the offender is one of the designated representatives identified above.

### 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.

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

### Responsive Action

Misconduct constituting harassment, discrimination or retaliation will be dealt with promptly and appropriately. Responsive action, up to and including termination, may be taken by Light & Wonder, Inc. as appropriate under the circumstances, including, 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, reduction of wages or bonus, demotion, reassignment, temporary suspension without pay or termination.

Individuals who have questions or concerns about this policy shall be referred to the Human Resources Department, which has overall responsibility for this policy and maintains reporting and monitoring procedures.

Finally, this policy 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



Light & Wonder, Inc. 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.

*Light & Wonder, Inc. reserves the right to change or modify this policy at any time. Should any provision of this policy be or become unlawful by virtue of an applicable law, such provision shall be considered null and void to the extent necessary to render the remaining portion of this policy lawful.*