Date Revised: October 6, 2016

Acting ethically, with integrity and in compliance with applicable laws and regulations is not only the right thing to do, it is how we do business. Company policies define the requirements that govern your conduct. The Statement of Respect and Anti-Discrimination and Harassment Policy (“Policy”) provides information on your responsibilities for establishing and maintaining a professional work environment free of illegal discrimination and harassment.

Applies To

This Policy applies to all associates of Barings and temporary or contract workers and interns (“temporary personnel”).

Definitions

**Discrimination** - When an employment decision (like hiring, promotion or compensation) is based on a person’s status as a member of a certain class of people, such as age, ancestry, citizenship status, color, disability (mental or physical), gender identity, genetic information, marital status, national origin, protected veteran status, race, religion, sex or sexual orientation, rather than on the basis of the person’s qualifications or individual abilities Federal and state (and sometimes local) laws prohibit discrimination in employment and define the specific groups to which these prohibitions apply.

**Harassment** - Verbal or physical conduct or behavior that attacks the character or reputation or shows hostility or aversion toward an individual because of:

- That person’s age, ancestry, citizenship status, color, disability (mental or physical), gender identity, genetic information, marital status, national origin, protected veteran status, race, religion, sex or sexual orientation;
- The protected classes of the person’s relative, partner, friend or associate; or
- That person’s participation in activities identified with the interests of people who are members of groups based on the above categories.

Actions are considered harassing if they have the purpose or effect of:

- Creating an intimidating, hostile or offensive working environment;
- Unreasonably interfering with an individual’s work performance; or
- Otherwise adversely affecting an individual’s employment opportunities.

Examples of verbal or physical conduct or behavior that can constitute harassment include: bullying (including cyberbullying/ stalking); epithets; slurs; negative stereotyping; jokes; innuendoes; derogatory comments about appearance or lifestyle; cartoons; pranks; threatening,
intimidating, sexual in nature or hostile acts; exclusion of particular associates or groups if there is no legitimate business basis for such exclusion; or any written, electronic or graphic material.

**Retaliation** – When an individual who, in good faith, has made a complaint of discrimination or harassment or who has cooperated with an investigation of such claims experiences an adverse action because of the complaint or cooperation.

**Sexual Harassment** – A type of harassment based on sex, gender or sexual orientation. By law, unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct or behavior of a sexual nature constitute sexual harassment when:

- Submission to or rejection of such conduct or behavior is made explicitly or implicitly a term or condition of employment;

- Submission to or rejection of such conduct or behavior is used as the basis for any employment decision, such as favorable reviews, promotions, raises, bonuses, increased benefits, and work assignments; or

- Such conduct or behavior has the purpose or effect of unreasonably interfering with work performance by creating an intimidating, hostile or offensive work environment.

Sexual harassment can occur between same- or opposite-sex individuals. In some situations, conduct that occurs between coworkers outside the workplace may be considered sexual harassment.

**General Requirements**

Barings is committed to:

- Creating and fostering a professional work environment in which associates and others working with the company continually demonstrate that they respect the opinions, attitudes, attributes and feelings of anyone with whom they come in contact during their daily work;

- Providing a work environment that is free from all forms of discrimination and harassment, including sexual harassment;

- Investigating all allegations of illegal discrimination and harassment. In addition, Barings will not tolerate and, where warranted, will investigate unprofessional, improper or disrespectful conduct or behavior, even if it may not be considered to be illegal discrimination or harassment;

- Ensuring no individual who, in good faith, has made a complaint of illegal discrimination or harassment or who has cooperated with an investigation suffers retaliation; and
• Holding all individuals to the same high standards of conduct and personal accountability.

Responsibilities

Your responsibilities are to:

• Report discriminatory or harassing behavior to your manager or Barings Human Resources;
• Value and be respectful of others’ differences;
• Treat others professionally, and with honesty, integrity and respect;
• Strive to achieve a diverse and inclusive environment;
• Do not retaliate;
• Ensure any guest, vendor or temporary worker for whom you are responsible acts in a professional, respectful manner when onsite or engaging with Barings associates;
• Cooperate with any Barings investigation into a complaint of discriminatory, harassing, or unprofessional behavior; and
• If you’re a manager or supervisor and observe or receive a complaint of discriminatory or harassing behavior or conduct, you must report the information to Human Resources immediately.

Barings’s responsibilities:

• Establish and maintain a professional, respectful work environment where individuals are expected to treat others professionally, and with honesty, integrity and respect;
• Strive to achieve a diverse and inclusive work environment;
• Educate managers and associates in the prevention and elimination of discrimination and harassment;
• Encourage an environment that embraces this Policy;
• Conduct a prompt, discrete and thorough investigation when a complaint of discriminatory, harassing, retaliatory conduct or behavior is received (and for concerns regarding unprofessional, improper or disrespectful conduct, as warranted); Appropriately discipline individuals who violate this Policy; and
• Communicate this Policy to associates annually.
Complaints

If you are subjected to or observe any behavior or conduct that you believe violates this Policy, report your concerns immediately. There are a variety of methods you may use. You may report any behavior or conduct that you believe violates this Policy to:

- Your manager;
- Your manager's manager (in the event your manager is engaged in the inappropriate conduct/behavior);
- Human Resources;
- The Compliance and Ethics Reporting Hotline;
- Compliance;
- Legal; or
- A state or federal agency, for discrimination, harassment or retaliation claims (see additional resources and FAQs for more detail).

Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. Barings will promptly, discretely and thoroughly investigate all claims of alleged discrimination and harassment and will take prompt corrective action, if appropriate.

Enforcement and Discipline

If you violate this Policy, you may be subject to discipline, including termination of employment.

For temporary personnel who violate this Policy, appropriate action may include termination of contract or business relationship, dismissal or prohibition from Barings property or events.

Additional Resources

For more information about this Policy, contact:

- Your manager
- Shannon Fitzpatrick, Human Resources Generalist – 860-509-2327
- Candy Kantianis, Director, Human Resources – (413) 226-1201
- Lisa Kusek, Director, Human Resources – (413) 226-1800
- Carolyn Zolty, Vice President, Human Resources – (860) 509-2277