

Harassment and Discrimination Prevention Policy

Revised: May 17, 2022

HARASSMENT AND DISCRIMINATION PREVENTION

We are committed to a workplace where all individuals are treated with respect and dignity. You and your coworkers, and those who interact with us, have the right to work in a professional and collaborative atmosphere that promotes equal opportunity without harassment or discrimination. BCS prohibits and seeks to prevent any form of harassment or discrimination based on any of the protected characteristics listed.

Harassment and discrimination occur when a person's behavior creates a hostile work environment, interferes with another's ability to do their job, or affects that person's employment. We ask you to help us prevent harassment and discrimination by not engaging in unlawful harassment and by recognizing the behaviors that may violate this policy, such as:

- Offensive and degrading verbal comments, words, jokes, stories, slurs, etc.
- Physical contact that is unwanted by the recipient, such as touching, leering, gestures, impeding
 or blocking movement, etc.
- Written, printed, or electronic comments, jokes, images, posts, etc. that are offensive or degrading
- Conditioning any aspect of employment upon whether a person is willing to grant sexual favors
- Conduct that has the purpose or effect of interfering with an individual's performance or creating an intimidating, hostile or offensive work environment.

This policy applies to everyone who works for us or engages with us on company business, both at work and during business-related events. If you believe that you or another person has been the subject of harassing or discriminatory behavior, you must bring this to the attention of Human Resources or the Ethics and Compliance Helpline immediately. Your report will be investigated promptly and confidentially to the extent possible and dealt with appropriately. You cannot be retaliated against for bringing forth a good faith report of harassment or discrimination, and BCS will protect you and those involved in these reports against any retaliation. Any employee found to have violated this policy, including making a report in bad faith, will be subject to disciplinary action up to and including termination of employment.

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ETHICS AND COMPLIANCE HELPLINE

BCS is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching management or Human Resources in instances where you believe violations of policies or standards have occurred.

In situations where you prefer to place an anonymous report, you may use this Ethics and Compliance Helpline, hosted by a third -party helpline provider, EthicsPoint. You are encouraged to submit reports relating to violations, potential violations, or other questionable conduct as outlined in our Code of Business Conduct or other policies.

When reporting via the Ethics and Compliance Helpline, whether via the Web or the phone, you may choose to identify yourself, which often facilitates BCS's ability to fully address your report. BCS has a policy of confidentiality and will protect your identity to the extent permitted by law and professional standards, as consistent with BCS's need to conduct a thorough investigation, if warranted, or to take other appropriate action. BCS has a strict policy of non-retaliation for good faith reporting by company personnel, even if sufficient evidence is not found to substantiate the concern.

Website: bcsf.ethicspoint.com

Toll-free Helpline Number: (844) 715-9584

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