

# Third-Party Harassment Policy

**Company name:** Teneo Ltd and Subsidiaries

**Date completed:** 15<sup>th</sup> September 2025

**Reviewed by:** James Hall, VP of Compliance

**Review date:** 15<sup>th</sup> September 2025

## 1. Policy Statement

Teneo is committed to maintaining a work environment that is free from unlawful sexual harassment and harassment of any kind. This includes harassment perpetrated not only by employees, but also by non-employees with whom employees may come into contact in the course of their duties, including but not limited to customers, vendors, suppliers, contractors, consultants, visitors, and any other third parties.

Teneo strictly prohibits sexual harassment or harassment of any kind of its employees by third parties, as well as harassment of third parties by employees. Any such conduct will not be tolerated and may result in corrective or disciplinary action, up to and including termination of employment or termination of business relationships, as applicable.

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## 2. Scope of Application

This policy applies to all employees of Teneo, regardless of job title, classification, or length of service. It also applies to all work-related settings and activities, whether on Teneo premises, offsite, during business travel, at customer locations, or at Teneo sponsored events.

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## 3. Definition of Harassment

For purposes of this policy, “harassment” is defined as unwelcome conduct that is based on a protected classification under applicable law, including but not limited to race, colour, religion, sex, gender identity, sexual orientation, pregnancy, national origin, age, disability, genetic information, or any other legally protected status.

Harassment may take many forms, including, but not limited to:

- **Sexual Harassment:** unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, or offensive environment.
- **Verbal conduct:** epithets, derogatory comments, slurs, or unwanted sexual advances.

- **Physical conduct:** assault, unwanted touching, impeding or blocking movement, or inappropriate gestures.
  - **Visual conduct:** display of offensive materials, such as posters, cartoons, or emails.
  - **Threatening or intimidating behaviour:** any conduct that interferes with an employee's ability to perform their work or creates an intimidating, hostile, or offensive work environment.
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#### **4. Reporting Procedures**

Employees who believe they have been subjected to harassment by a third party, or who have witnessed such conduct, are required to report the incident immediately. Reports may be made to:

- The employee's direct manager;
- The Human Resources Department; or
- Any other member of management with whom the employee feels comfortable.

Employees are encouraged to provide detailed information regarding the alleged conduct, including the identity of the third party, dates, times, locations, and a description of the behaviour.

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#### **5. Investigation and Corrective Action**

All complaints will be taken seriously and investigated promptly, thoroughly, and impartially. Investigations will be conducted in a manner designed to protect the confidentiality of all parties involved to the extent feasible.

If it is determined that harassment has occurred, Teneo will take appropriate corrective action. Such action may include, but is not limited to:

- Issuing a warning to the third party;
  - Limiting or prohibiting further contact between the third party and the employee(s);
  - Terminating contracts, services, or business relationships with the third party;
  - Reporting unlawful conduct to law enforcement authorities, where appropriate.
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#### **6. Protection Against Retaliation**

Retaliation against any employee who reports harassment, participates in an investigation, or otherwise engages in protected activity is strictly prohibited. Any employee who believes they have been subjected to retaliation must report it immediately through the procedures outlined above.

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## **7. Employee Responsibilities**

All employees are expected to:

- Refrain from engaging in sexual harassment or harassment of any kind of third parties;
- Report any incidents of sexual harassment or harassment of any kind by third parties; and
- Cooperate fully with any investigation conducted under this policy.

Failure to adhere to these responsibilities may result in disciplinary action, up to and including termination of employment.

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## **8. Policy Administration**

The Human Resources Department is responsible for the administration, interpretation, and enforcement of this policy. This policy will be reviewed periodically to ensure continued compliance with applicable laws and best practices.