

# EQUAL EMPLOYMENT OPPORTUNITY AND ANTI-HARASSMENT POLICY

## PURPOSE

Ameren strives to maintain a culture and working environment free from discrimination and harassment for all employees, applicants, customers, vendors, contractors, and visitors to Ameren. Consistent with Ameren's corporate values of Integrity, Respect, Accountability, Stewardship, Teamwork, and Commitment to Excellence, every Ameren employee is expected to demonstrate behaviors consistent with this policy.

#### PERSONS AFFECTED

This policy applies to all Ameren employees, applicants, customers, contractors, vendors and any person visiting any Ameren facility. This policy applies to employees while on Company property, on Company worksites, in a Company vehicle, or wherever an employee is performing a function of his/her job, participating in a Company sponsored event on or off Company property, or engaging in activity related in any way to employment with Ameren.

## POLICY

Ameren is an equal opportunity employer and is committed to the fair and equal treatment of all employees. It is a fundamental policy of Ameren and its subsidiaries and affiliates to maintain a workplace that is free from discrimination or harassment of any kind in compliance with all applicable federal, state, and local laws. Ameren prohibits all forms of discrimination and harassment, whether based on race, color, religion, sex, national origin, ethnicity, age, disability, genetic information, military service or status, pregnancy, marital status, sexual orientation, gender identity or expression, or any other class, trait, or status protected by law, hereinafter collectively referred to as "protected factors". Ameren also prohibits unwelcome and/or inappropriate conduct that is directed at a person because of any protected factors. It should be noted that Ameren maintains zero tolerance with regard to the fair and equal treatment of all employees and thus prohibits inappropriate conduct that is not based on protected factors but is considered inappropriate with regard to the treatment of employees is prohibited by this policy, and such conduct may also be a violation of other Ameren policies, performance expectations, and Ameren's corporate values and accordingly may still be subject to corrective action.

All complaints or allegations of potential discrimination or harassment or other violations of this policy should be immediately reported. Complaints of this nature will be promptly investigated. In the event discrimination or harassment or other conduct in violation of this policy is found to have taken place, appropriate action will be taken, up to and including discharge.

## ANTI-DISCRIMINATION

Ameren will not discriminate in hiring, promotion, training, pay, benefits, or other terms and conditions of employment because of any protected factors. Ameren complies with all applicable equal opportunity laws and regulations. The Company is committed to administering personnel action in compliance with such laws and regulations, and to taking affirmative action measures as required of federal contractors. Employment decisions at Ameren are based on appropriate job-related factors, including, but not limited to, individual merit, skills, qualifications, prior job experience, and demonstrated work performance.

Ameren will attempt to provide reasonable accommodations to employees who inform the Company of known medical conditions that impact major life activities, provided the employee is able to perform the essential functions of his/her position, with or without a reasonable accommodation. The Company will also attempt to provide reasonable accommodations for religious expression when an employee makes the need known, provided the

religious expression is not coercive or demeaning to another individual's sincerely held religious beliefs, or lack of such beliefs.

It is the responsibility of every employee to ensure that discrimination or harassment based on any protected factors does not occur in the workplace. Employees who experience problems in the area of equal employment opportunity should discuss the matter with a supervisor, manager, director, or the appropriate HR Services & Employee Relations representative who supports their business segment, or any Human Resources leader.

## ANTI-HARASSMENT

Ameren prohibits all forms of unlawful harassment. Unlawful harassment generally includes, but is not limited to, unwelcome or unsolicited conduct based upon or directed at a person because of any protected factors. Harassment can be physical, verbal or visual in nature, and includes behavior that is demeaning, offensive and/or indicates hostility toward persons in the workplace based on any protected factors. Conduct is in violation of this policy when it is sufficiently severe or pervasive that it has the purpose or effect of unreasonably interfering with an individual's work performance or creates a hostile, intimidating, or offensive work environment for the individual.

#### PROHIBITED CONDUCT

Ameren also prohibits all forms of inappropriate conduct by anyone subject to this policy as it pertains to the treatment of employees. Inappropriate conduct prohibited by this policy may not always rise to the level of discrimination or harassment. Rather, inappropriate conduct is often demeaning or offensive or indicates hostility towards others even if the conduct is not based on or directed at a person because of a protected factor. The following examples are provided to assist in the interpretation of what Ameren views as prohibited conduct under this policy. This list is not meant to be all-inclusive. Other conduct not specifically identified below may also be prohibited by this policy. Certain conduct need not be "unwelcome" or observed by others for it to violate this policy (e.g., inappropriate use of the Internet).

#### Physical conduct, such as:

- 1. Rape, sexual battery, molestation or attempts to commit such assaults.
- 2. Unwelcome and/or inappropriate conduct that is sexual in nature or attempts to engage in such conduct. Examples may include unwelcome sexual advances, touching, pinching, poking, patting, grabbing, or brushing against another person's body; kissing or fondling another person against his/her will; impeding or blocking a person's movement; sitting on someone's lap; massaging neck, shoulders or other parts of a person's body.
- 3. Unwelcome and/or inappropriate physical conduct or attempts to engage in such conduct that is not sexual in nature but is offensive, intimidating and/or potentially harmful and/or is based on any protected factors.

## Verbal conduct, such

<u>as:</u>

- 1. Offensive, derogatory, intimidating, persistent or otherwise inappropriate remarks, jokes, comments, references, or slurs.
- 2. Demeaning, offensive, or otherwise inappropriate remarks, jokes, comments, or references about a person's sex, sexuality, sexual orientation or sexual experiences or about a person's body. Examples may include requests for sexual activity; lewd or explicitly sexual language; gestures that are typically judged to be sexual in nature; inappropriate references about an individual's sexual activities, experiences, deficiencies or prowess; repeated and/or unwelcome comments regarding a person's physical appearance; and repeated requests for dates.

#### Other inappropriate or offensive behavior or actions (both implied and explicit), such as:

1. Subjecting, or threatening to subject, others to intimidating, unwelcome or unsolicited conduct including expressing excessive unwanted romantic attention toward another individual, or intentionally making performance of the employee's job more difficult.

- 2. Unwelcome and/or inappropriate communications, including notes, faxes, phone calls, text messages, voice mail, electronic mail (e-mail), or Internet/Intranet medium, and/or displaying, possessing, viewing or bringing into the workplace (including lockers, offices, cubicles, restrooms and Ameren vehicles) graffiti, pictures, posters, calendars, objects, promotional materials, reading materials, or computer graphics, Internet sites (including attempting to access or display inappropriate Internet websites that are blocked or restricted), e-mail or other materials that are:
  - a) sexually suggestive, demeaning or pornographic;
  - b) racially, ethnically or religiously derogatory; and/or
  - c) intimidating or offensive on the basis of any protected factors.

Examples of unwelcome and/or inappropriate communications may include posting racially motivated jokes, cartoons or symbols; displaying promotional calendars that are sexually suggestive; accessing sexually suggestive or pornographic Internet sites; and distributing or posting jokes or cartoons about a person because of any protected factors.

- An item may be considered "sexually suggestive" if, for example, it depicts a person of either sex who is not fully clothed or who is posed in a manner that is sexually provocative and/or who is posed for the purpose of displaying the private portions of his/her body.
- Such actions and items may violate this policy whether or not the items are readily accessible or easily viewed by others. Accordingly, Ameren reserves the right to inspect Company property (e.g., lockers, offices, cubicles, restrooms, voicemail, vehicles, computers and other Ameren property) to ensure that no inappropriate items are brought into the workplace.
- 3. Making employment decisions based on inappropriate, discriminatory or protected factors, including but not limited to:
  - a) Preferential treatment or promises of preferential treatment to any employee for submitting to sexual conduct, including soliciting or attempting to solicit any employee to engage in sexual activity for compensation or reward; or making employment decisions based on sexual favoritism in a consensual relationship; or
  - b) Taking or threatening to take adverse employment action based on an employee's refusal to submit to sexual advances or to participate in sex-related conduct.

#### COMPLAINT PROCEDURES

Employees who believe they have been subjected to discrimination, harassment, or other conduct in violation of this policy, or who observe such discrimination, harassment, or other conduct directed at others, should immediately report the incident to a supervisor. If they feel it would be inappropriate to discuss the incident with their supervisor, or if their supervisor is the subject of the complaint, they should contact a manager or director, the appropriate HR Services & Employee Relations representative who supports their business segment, or any Human Resources leader. All reports of alleged harassment, discrimination, or other prohibited conduct will be promptly investigated and addressed, to the extent possible, in a confidential manner. Disclosure regarding such matters will be on a need-to-know basis, consistent with the rights of all persons involved, and with the obligation of Ameren to investigate the allegation and, when necessary, to take prompt and appropriate action.

All employees are expected to act responsibly and honestly when they present allegations they suspect violate this policy. Any employee identified as a potential witness is expected to fully cooperate during an investigation and maintain the confidentiality of investigation information. Employees who fail to fully cooperate during an investigation or to maintain the confidentiality of investigation information will be subject to disciplinary action, up to and including discharge.

Any leader who becomes aware of conduct or a situation that may violate this policy must report this to HR Services & Employee Relations and failure to report the conduct or situation to HR Services & Employee Relations will be subject to disciplinary action, up to and including discharge.

Accusations of discrimination, harassment, or other prohibited conduct made in bad faith have a serious effect on innocent persons and Ameren and significantly disrupt the working environment. Bad faith accusations do not

refer to complaints made in good faith that cannot be proven. If, however, an investigation results in a determination that an individual knowingly or maliciously made bad faith accusations under this policy, he/she will be subject to appropriate disciplinary action, up to and including discharge.

#### **PROHIBITION AGAINST RETALIATION**

Ameren will not tolerate any form of retaliation against anyone making a good faith report or complaint about actual or potential acts of discrimination, harassment, or other prohibited conduct or cooperating during a related investigation. Any employee who is found to be engaging in such retaliation will be subject to appropriate disciplinary action, up to and including discharge.

#### ENFORCEMENT

If it is determined that an Ameren employee has engaged in discrimination, harassment, retaliation, or other prohibited conduct in violation of this policy, Ameren will take appropriate disciplinary action. Discipline may include counseling, written warning, suspension, transfer, demotion, discharge, or any other action deemed appropriate under the circumstances.

#### CORPORATE RESPONSIBILITY

For additional information, employees should contact the appropriate HR Services & Employee Relations representative who supports their business segment, any Human Resources leader, or the Sr. Director, HR Services & Employee Relations at (314) 554-4116 or Extension 44116.