



Revision No.: 2
Issued By: Human Resources
Approved By: EVP, Chief, Legal & Compliance Officer
Effective Date: November 1, 2021

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## **ANTI-HARASSMENT, DISCRIMINATION AND BULLYING POLICY**

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The Company is committed to providing its employees, agents, consultants, customers, vendors, guests, and invitees with a healthy and safe work environment, which includes an environment that is free from harassment, discrimination, and bullying. This policy applies to all Company employees, agents, consultants, customers, vendors, guests and invitees and applies at any Company workplace or jobsite, at any Company-related or sponsored functions, and while traveling on Company-related business.

### ***Sexual Harassment***

Sexual harassment is strictly prohibited by this Company policy and federal, state and local law. The Company will not tolerate sexual harassment by any person who is associated with or employed by the Company, which includes, but is not limited to the Company's employees, agents, consultants, customers, vendors, guests, and invitees.

Sexual harassment includes, but is not necessarily limited to, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature where:

- Submission to such conduct is made either explicitly or implicitly a term or condition of employment;
- Submission to or rejection of the conduct is used as the basis for an employment decision affecting the person (e.g. demotion, promotion, performance evaluation or compensation); or
- The conduct or speech has the purpose or effect of unreasonably interfering with a person's work performance or creating an intimidating, hostile or offensive working environment (e.g. offensive sexual jokes, slurs or comments, vulgar language, sexual gestures, sexual innuendo or suggestive comments, physical assaults, sexual advances or propositions, or displaying sexually oriented materials like publications, pictures, cartoons or photographs).

### ***Other Harassment, Discrimination or Inappropriate Conduct***

Harassment or discrimination based on a person's race, color, sex (including gender, pregnancy, sexual orientation, and gender identity), religion, national origin, citizenship, age, military and/or veteran status, disability, marital status, genetic information, or any other characteristic protected by applicable federal, state and local law is also prohibited by this Company. Additionally, any inappropriate or unprofessional conduct is strictly prohibited. Harassment, discrimination, and inappropriate or unprofessional conduct includes, without limitation, harassing or discriminatory intimidations, insults, ridicule and comments where:

- The conduct has the purpose or effect of creating an intimidating, hostile or offensive work environment;



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- The conduct has the purpose or effect of unreasonably interfering with an individual’s work performance;
- The conduct otherwise adversely affects an individual’s employment or advancement opportunities; or
- The conduct is deemed not to be in the best interests of the Company.

### ***Bullying in the Workplace***

Bullying in the workplace is strictly prohibited by this Company policy and will not be tolerated. Bullying is considered to be any unwelcome or unreasonable behavior that demeans, intimidates, humiliates, or mentally or physically injures people either as individuals or as a group. Bullying can occur as a single, severe incident or repeated incidents. Some examples of bullying behavior include, but are not limited to:

- **Verbal bullying** can include slandering, ridiculing, maligning a person or group, persistent name calling that is hurtful, insulting or humiliating, spreading rumor or innuendo, or abusive and offensive remarks about a person or group.
- **Physical bullying** can include pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, or damage to a person’s work area, property or work product.
- **Cyber bullying** includes bullying an individual in any electronic form including, but not limited to internet, email, mobile phones, messaging applications, and social media networks.
- **Exclusion** includes socially or physically excluding or disregarding a person or group in work-related activities.

### ***Responsibilities***

All employees, agents, consultants, customers, vendors, guests, and invitees are responsible for maintaining a workplace free of harassment, discrimination, and/or bullying. Any person may initiate a harassment, discrimination, and/or bullying complaint regarding incidents experienced personally or observed in the workplace. It is the responsibility of every person to bring complaints to the Company’s attention so that issues can be immediately and effectively resolved. A person should never assume that the Company is aware of inappropriate conduct that a person has witnessed or experienced. If anyone believes he or she have been the subject of discrimination, harassment, bullying, or other inappropriate behavior or conduct, that person should immediately notify the Company using the complaint procedures described below. Any individual found to have violated this policy shall be subject to appropriate disciplinary action, up to and including termination.



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## **Complaint Procedure**

Any person that feels they have been or is being harassed, bullied, or discriminated against in violation of this policy should inform, if feasible, the person engaging in the conduct that the conduct is unwelcome and must stop. The matter should also be immediately brought to the attention of the person’s supervisor and/or Human Resources. The complainant should choose the person listed above with whom he or she is most comfortable in discussing the details of the incident or conduct.

All reports of harassment, discrimination, or bullying will be treated seriously and confidentially to the extent possible, and there will be no retaliation against anyone who initiates a complaint or participates in the investigation of a complaint. Any complaints that are not made in good faith and/or any participation in an investigation which is not in good faith shall subject that person to disciplinary action, up to and including termination. In determining whether the alleged conduct constitutes a violation of this policy, the totality of the circumstances, the nature of, and the context in which the alleged conduct or incident occurred will be considered. If it is determined that a violation of this policy has occurred, immediate and appropriate action will be taken.

All reports or complaints disclosing information in the public interest, such as illegal or corrupt practices or health and safety concerns are to be reported to the Internal Grievances and Compliance Hotline, whether online or over the phone (<https://crestwoodlp.alertline.com> or 1-844-886-2116).

## **No Retaliation**

The Company prohibits retaliation in any form against any person who: initiates a complaint; reports the possible existence of harassment, discrimination, or bullying of others; or participates in or assists with the Company’s investigation of a complaint. Any person who believes retaliation has occurred should immediately report the alleged retaliation using the complaint procedure described above. Any individual found to have violated this anti-retaliation policy shall be subject to appropriate disciplinary action, up to and including termination.

*Should any information in this practice conflict with a Collective Bargaining Agreement or with any federal, state or local law, the applicable agreement or provision of law will take precedence.*