

Human Resource Policy & Procedure - Corporate

Policy Against Unlawful Harassment, Discrimination, and Retaliation Ad Procedure for Reporting Problems or Concerns

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Genesco is committed to providing an environment free from all forms of unlawful harassment, discrimination and retaliation on the basis of any actual or perceived legally protected characteristic, including race; color; religion; religious creed (which includes religious belief, observance, practice and dress or grooming practice); sex; national origin; ancestry; age (40 or older); military and veteran status; pregnancy, childbirth and breastfeeding and related medical conditions; physical or mental disability; medical condition (including cancer and genetic characteristics); genetic information; citizenship; marital or registered domestic/civil union partner status; sexual orientation; gender (including gender identity and gender expression) or other classifications to the extent protected by relevant local, state or federal law. Genesco's policy covers all employees of the Company (including, but not limited to, all supervisors and managers of the Company), applicants, paid and/or unpaid interns, persons providing services to the Company pursuant to a contract, and other third parties with whom employees may come in contact.

SEXUAL HARASSMENT

Unwelcome sexual advances, requests for sexual favors, and other verbal, graphic, or physical conduct of a sexual nature or on the basis of sex by any person in the workplace may constitute unlawful sexual harassment if:

1. Submission to such conduct is made explicitly or implicitly a term or condition of an individual's employment; or
2. Submission to or rejection of such conduct by an individual is used as the basis for personnel decisions affecting that individual; or
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work or creates an intimidating, hostile or offensive working environment.

Some examples of what may constitute sexual harassment are threatening to take or taking employment actions, such as discharge, demotion or reassignment, if sexual favors are not granted; demands for sexual favors in exchange for favorable or preferential treatment; unwelcome and repeated flirtations, propositions or advances; threats or reprisals after a negative response to sexual advances; unwelcome physical touching or contact; assaulting; impeding or blocking movement; whistling; leering; obscene, vulgar or sexually suggestive gestures; sex, gender or sexual orientation-related jokes, pranks, tricks or horseplay; use of stereotypes; offensive, insulting, derogatory or degrading remarks or slurs; unwelcome comments about appearance; conduct or comments consistently directed at one gender, even if the content is not sexual; sexual jokes or use of sexually explicit or offensive language; and the display or distributing in the workplace of sexually suggestive, demeaning, insulting or intimidating objects or pictures. The above list of examples is not intended to be all inclusive. Sexual harassment need not be motivated by sexual desire and can exist between individuals of the same or opposite sex and regardless of their sexual orientation, gender, gender identity and/or expression. Employees should take care in the workplace and during informal business situations, including during Company functions and business trips.

A consensual romantic and/or sexual relationship between an employee with supervisory authority and any subordinate, including one not directly under the supervisor, will compromise the Company's ability to enforce its policy against sexual harassment. Consequently, if such relationships arise, they will be considered carefully by the Company, and appropriate action will be taken. Such action may include a change in the responsibilities of the individuals involved in such relationships or transfer of location within the Company to diminish or eliminate the supervisory relationship and workplace contact that may exist. Any supervisory employee involved in such a relationship is required to report the relationship to his or her supervisor, and to Human Resources

PROHIBITED CONDUCT

No employee shall refuse employment to a person, bar a person from employment, or discriminate against a person in compensation or in a term, condition or privilege of employment because of a legally protected characteristic, unless based upon a bona fide occupational qualification and where consistent with federal, state and local law.

For purposes of this policy, impermissible harassment or discrimination also includes any verbal, visual, or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her lawfully protected characteristic, and that:

- creates an intimidating, hostile or offensive work environment; or
- unreasonably interferes with an individual's work performance.

Abusive conduct and/or bullying on any protected basis is also prohibited. Some examples of such impermissible harassment or discrimination include, but are not limited to, slurs, jokes, teasing, gestures, deliberate touching, display of offensive material, and other unwelcome and offensive verbal, graphic, or physical conduct or behavior relating to an individual's characteristic protected by law. The above list of examples is not intended to be all-inclusive.

This policy applies to all communications, including, but not limited to weblogs (blogs), social networking websites, forums, e-mails, instant messaging, text messages, graphics and pictures, chat rooms and virtual worlds.

DISCIPLINARY ACTION

Genesco will not tolerate illegal harassment in any form. It is a form of discrimination, a violation of federal, state and/or local law, and a serious violation of the Company's policy. If it is determined that inappropriate conduct has been committed by an employee, the Company will take such action as is appropriate under the circumstances. Any unlawful discrimination, harassment and/or retaliatory conduct may result in disciplinary action, ranging from counseling up to termination, as deemed appropriate under the circumstances

REPORTING PROCEDURE

Genesco strongly encourages reporting of all perceived incidents of illegal harassment or discrimination, regardless of who the alleged offender may be, either orally or in writing. Genesco provides avenues by which individuals can report complaints of illegal harassment or discrimination. An individual who believes he or she is the victim of illegal harassment or discrimination or, who witnesses illegal harassment or discrimination of others should immediately discuss his or her concerns with his or her supervisor or another supervisor. Any employee seeking to file a complaint should ensure the complaint consists of precise details of each incident of abusive conduct including dates, times, locations and any witnesses. Formal complaints should be documented in writing, but are not required to be in writing.

Genesco requires supervisors and managers of the Company to report incidents of illegal harassment or discrimination and retaliation.

If the employee does not feel comfortable discussing the situation with his or her supervisor or another supervisor or is not satisfied with the action taken by the supervisor, the employee should contact the Human Resources Department, 535 Marriott Drive, 11th Floor, Nashville, TN 37214, by telephone at (615)367-7598 or (800) 404-5370, or via email at respect@genesco.com. An individual is not required to discuss the concern with the alleged harasser. An individual is not required to discuss the concern with his or her supervisor. All Company supervisors must promptly report any complaints to the Employee Relations & Compliance Manager in the Human Resources Department. Supervisory personnel who allow abusive conduct to continue or fail to take appropriate action upon learning of such conduct will be subject to corrective action. Such corrective action may include but is not limited to participation in counseling, training, or disciplinary action up to and including termination, or changes in job duties or location.

Genesco will promptly investigate and respond to all complaints of illegal harassment or discrimination. Employees are expected to cooperate with the Company's investigation to the fullest extent. False information provided in the course of an investigation is grounds for discipline, including termination. The Company will use qualified personnel to conduct a fair, impartial, timely, and thorough investigation that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. The steps of an appropriate investigation cannot be fixed in advance, but will vary depending upon the nature of the allegations. The Company will utilize appropriate documentation and tracking to ensure reasonable progress and timely closure of the investigation. When unlawful sexual or other harassment, discrimination or conduct in violation of the Company's policy is found to have occurred, appropriate remedial action will be taken.

All reports of harassment or discrimination will be treated in a confidential manner, subject to the Company's legal obligation to investigate and respond appropriately to such complaints.

Further, appropriate steps will be taken to investigate and respond to any complaints of illegal harassment or discrimination involving a non-employee's conduct or behavior or an employee's conduct or behavior against a non-employee under this policy, whether the non-employee is a vendor, customer or other.

An individual who reports incidents that the employee believes to be violations of this policy, or who is involved in or participates in a proceeding or investigation concerning a violation of this policy, will not be subject to reprisal or retaliation. In other words, the Company will not allow any co-worker, supervisor, manager or Company officer to take adverse action against any person for reporting alleged harassment, discrimination or retaliation in good faith, or for testifying, assisting, or participating in a discrimination investigation or proceeding. Retaliation is unlawful and prohibited. It is a serious violation of this policy, and employees should report any retaliatory conduct immediately. The Company will likewise implement appropriate investigation consistent with this policy of any allegations of retaliation. Any person found to have retaliated against an individual for reporting discriminatory harassment or participating in a proceeding or investigation concerning allegations of such conduct will be subject to appropriate disciplinary action.