



## Anti-Harassment and Anti-Sexual Harassment Policy

### Purpose

WEC Energy Group policy prohibiting harassment is a statement of WEC Energy Group's commitment to providing a workplace free from harassment and discrimination. The policy is applicable to all employees of WEC Energy Group's subsidiaries and affiliates thereof and outlines the responsibilities of employees, supervisors and managers, and includes the procedure for filing complaints. This policy reinforces WEC Energy Group's value of developing and maintaining a professional environment comprised of people who respect one another. It is the responsibility of all employees to uphold that value.

### Policy

Harassment consists of unwelcome conduct, whether verbal, physical or visual, that is based upon a person's protected status or qualification, such as sex, age, race, color, creed, religion, disability, marital status, sexual orientation, gender identity, perceived gender, genetic information, national origin, ancestry, citizenship, pregnancy, military status, veteran status, family responsibilities, reproductive health decisions or other status protected by applicable federal, state or local laws. WEC Energy Group seeks to provide a work environment that is free from harassment and discrimination based on any protected classifications.

WEC Energy Group will not tolerate harassing conduct that affects job benefits, that interferes unreasonably with an individual's work performance, or that creates an intimidating, hostile, or offensive working environment. Such harassment may include, for example:

- kidding, teasing, jokes, racial, ethnic, religious, or other discriminatory insults or slurs,
- emails, notes, cartoons, pictures,
- sabotage of another person's work product, or related actions that hinder the performance of another employee,
- striking, shoving, kicking or otherwise subjecting another person to physical contact or attempting or threatening to do the same,
- engaging in conduct or repeatedly committing acts which harass or intimidate another person and which serve no legitimate business purpose, and
- other similar conduct intended to demean or disturb a person because of any protected status.

Sexual harassment consists of unwelcome sexual advances or unwelcome conduct of a sexual nature, requests for sexual favors or conduct of a sexual nature, and other physical, verbal, or visual conduct based on sex when (1) submission to the conduct is an explicit or implicit term or condition of employment, (2) submission to or rejection of the conduct is used as the basis for an employment decision, (3) the conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment. In addition, sexual harassment also consists of sexual misconduct (i.e., any behavior of a sexual nature), which also involves coercion, abuse of authority, or misuse of an individual's employment position.

Sexual harassment may include, but is not limited to the following:

- Explicit sexual propositions, sexual advances, or sexual innuendo;

- Suggestive comments, jokes, stories, sexually-oriented “kidding” jokes about obscene printed or visual material or “teasing;”
- Requests for sexual favors used as a condition of employment or affecting any personnel decision such as hiring, promotion, compensation or termination (i.e. Quid Pro Quo);
- Physical contact such as patting, pinching or brushing against another person’s body;
- Display of sexually explicit or otherwise offensive posters, calendars or materials;
- Making sexual gestures with hands or body movements;
- Inappropriately staring at another employee or touching his or her clothing, hair or body;
- Whistling at another employee, cat calls;
- Repeatedly asking out an employee who has stated that he or she is not interested; and
- Excessive attention in the form of love letters, telephone calls, e-mails, other electronic media, faxes or gifts.

These activities are offensive and are inappropriate in the workplace. The company has a responsibility to prevent, investigate and address sexual harassment. This is a serious issue not just for WEC Energy Group but also for the offending individual. Offending individuals may be subject to disciplinary action up to and including discharge. Sexual harassment is illegal. In addition, an employee may be held individually liable and subject to the same penalties which may be imposed upon employers under state or federal law.

It is the responsibility of all employees to ensure that these prohibited behaviors do not occur.

### **Role of Leaders**

Managers and supervisors have a specific responsibility to avoid the appearance of, as well as not demonstrate behaviors, that would be in violation of the harassment policy.

In addition, managers and supervisors must stop or address any observed prohibited behaviors, even in the absence of an employee complaint.

### **Procedure for reporting complaints**

It is the employee's responsibility to bring genuine complaints and concerns to WEC Energy Group's attention so that they may be resolved. Employees cannot assume that the Company is aware of the problem.

If an employee believes that he/she has experienced or witnessed harassment in any way by a coworker or an employee of a customer or a vendor, the employee should notify his/her supervisor immediately. If the supervisor or other member of management is involved in the prohibited behavior, contact [April Hackett](#), Sr. HR Consultant.

Supervisors who receive complaints from employees should take prompt/effective action to end the harassment. Supervisors must promptly consult with the above identified individuals to determine appropriate action and all actions should be documented and sent confidentially to [April Hackett](#), Sr. HR Consultant.

Employees who have made a complaint to their supervisor may contact [April Hackett](#), Sr. HR Consultant and complete the [complaint form](#).

WEC Energy Group policy is to investigate all such complaints thoroughly and promptly. To the fullest extent practicable, WEC Energy Group will keep complaints and the terms of their resolution confidential. If the investigation determines that a violation of this policy has occurred, WEC Energy Group will take corrective action, including discipline up to and including discharge.

Employees are always encouraged to report conduct which they believe to be a violation of the Anti-Harassment and Sexual Harassment policy so that WEC Energy Group can take all necessary action to address the complainant's concerns and ensure compliance by WEC Energy Group with the law and with

its Equal Employment Opportunity Policy. Employees may also contact their state agency or the Equal Employment Opportunity Commission (EEOC) to file complaints.

### **Additional protections and remedies**

- An individual may file a complaint either with the Illinois Department of Human Rights (IDHR), or the applicable state agency in the state where you work or the United States Equal Employment Opportunity Commission (EEOC). The complaint must be filed within 300 days from the alleged sexual harassment for the EEOC and 600 days for the IDHR.
  - o Complaints filed with one agency are deemed to be cross-filed with the other.
- You do not need an attorney to file a complaint with either the IDHR or EEOC.
- You must file a complaint with the EEOC and/or IDHR before you can file a lawsuit in state or federal court
  - o For more information on filing a complaint with the EEOC: [www.eeoc.gov](http://www.eeoc.gov)
  - o For more information on filing a complaint with the IDHR: [www.illinois.gov/sexualharassment](http://www.illinois.gov/sexualharassment)

### **No retaliation**

WEC Energy Group prohibits retaliation against anyone who reports in good faith harassment or assists in making a harassment complaint or cooperates in a harassment investigation. If you feel you have been retaliated against, you are to notify any of the individuals identified in the paragraph above regarding the procedure for reporting complaints.

### **Additional terms applicable to registered Illinois Lobbyists**

The above policy applies to all registered Illinois Lobbyists whether employees or Company contractors. In addition to the above terms, each Registered Illinois Lobbyist shall be free from retaliation and shall be afforded any rights under the whistleblower protections under Illinois laws. Each registered Illinois Lobbyist shall take annual training on sexual harassment provided in the first quarter each year.

### **Additional references**

Contact the [Employee Service Center](#) at 414-221-3131 or 888-427-3164 or contact [April Hackett](#), Sr. HR Consultant for clarification and additional information regarding the administration of this policy.

Illinois Department of Human Rights  
Chicago: 312-814-6200 or 800-662-3942  
Springfield: 217-785-5100  
Marion: 618-993-7463

Illinois Human Rights Commission  
Chicago: 312-814-4760  
Springfield: 217-785-4350

United States Equal Employment Opportunity Commission: 800-669-4000

[City of Chicago Anti-Sexual Harassment Addendum effective July 1, 2022.](#)

### **Related resources**

[Code of Business Conduct](#)

Discrimination/Harassment Internal Complaint Form

Employment of Family Members and Restrictions on Personal Relationships

Family Medical Leave—Illinois FMLA Policy Addendum

[Non-Retaliation Policy](#)