



Corporate Policy: Anti-Harassment Policy	Last Revised: April 2018
Department Owner: Corporate Human Resources & Legal	Applicable To: All Employees

1.0 PURPOSE

Charter Communications ("Charter") is committed to providing a professional work environment free of discrimination and harassment of any kind, including sexual harassment or harassment on the basis of race, color, sex, pregnancy, age, religion, creed, physical or mental disability status, medical condition, genetic information, national origin, nationality, ancestry, citizenship status, veteran status, military status, sexual orientation, gender identity, gender expression, marital status, domestic partnership status, or any other basis protected by law.

The purpose of this Policy is to communicate Charter's zero tolerance of sexual and other forms of harassment and Charter's dedication to promoting an environment that is free from sexual and other forms of harassment, by: (1) ensuring that employees understand what harassment is, (2) providing procedures for reporting complaints about conduct that violates this Policy; and (3) communicating the steps the Company will take in the case of a violation of this Policy.

2.0 SCOPE

This Policy applies to all Charter employees, whether on or off Company premises or property, or on or off Company time, as described more fully below.

3.0 POLICY

Harassment Is Prohibited

Harassment is conduct that demeans or otherwise mistreats another person on the basis of race, color, sex, pregnancy, age, religion, creed, physical or mental disability status, medical condition, genetic information, national origin, nationality, ancestry, citizenship status, veteran status, military status, sexual orientation, gender identity, gender expression, marital status, domestic partnership status, or any other basis protected by law. Charter believes that harassment undermines the integrity of the employment relationship and, therefore, is strictly prohibited by the Company.

Harassment includes verbal harassment (e.g., derogatory statements, slurs, or epithets), physical harassment (e.g., assault, threatened assault, or physical interference), visual harassment (e.g., cartoons, drawings, postings, or emails) and innuendo and other forms of conduct which are based on any protected characteristic or trait. Derogatory or offensive actions, words, displays, pictorial material, jokes, and threats will not be tolerated by Charter, even if the conduct does not constitute unlawful harassment. This includes harassing conduct on social media or elsewhere. Charter also will not tolerate harassing conduct that affects tangible job benefits, that interferes unreasonably with an employee's work performance, or that creates an intimidating, hostile, or offensive working environment. It violates

Charter's Policy to engage in any of these activities even if they do not meet the standards for unlawful harassment.

Charter Will Not Tolerate Any Form of Sexual Harassment

Likewise, Charter will not tolerate any form of sexual harassment. Sexual harassment is defined for purposes of this Policy as unwelcome sexual advances, request for sexual favors and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of employment;
- Submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such an individual; or
- Such conduct has a purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Forms of Sexual Harassment

Because some forms of sexual harassment are subtle and/or may not be easily recognized as sexual harassment, the following are examples of conduct that may constitute sexual harassment under our Policy:

- 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 of a sexual nature;
- unwelcome physical contact (including, but not limited to physical assaults of a sexual nature, such as rape, sexual battery, molestation or attempts to commit these assaults, and intentional physical conduct that is sexual in nature, such as touching, pinching, patting, grabbing, brushing against another employee's body or poking another employee's body);
- whistling, leering and/or other improper gestures;
- tricks and/or horseplay;
- use of gender based and/or sexual stereotypes;
- offensive, insulting, derogatory or degrading remarks;
- unwelcome comments about appearance;
- sexual jokes or use of sexually explicit or offensive language;
- gender- or sex-based pranks;
- use of sexually patronizing terms such as "honey," "doll," "chick," "hunk," "stud," "babe"; and/or
- the display in the workplace of sexually suggestive objects or pictures.

The above list of examples is not intended to be all-inclusive. Sexual harassment can happen between same-sex individuals as well as between opposite sex individuals. "I was joking," "I didn't mean it that way" and/or another individual's (including an individual who is the subject of conduct that may constitute sexual harassment) participation in the alleged conduct, are not acceptable excuses to violations of this Policy. Nor is being under the influence of alcohol or other substances. Employees are expected to avoid such conduct at all times, including in formal and informal business situations, including without limitation, Charter functions and social events, office parties, off-site meetings and/or events, client and/or vendor entertainment events, business trips, dinners, and/or sporting events.

4.0 ENFORCEMENT

Reporting Harassment

Charter expects all of its employees, whether the employee is the victim of harassment, whether the employee has witnessed harassment or has been made aware of harassment, to report such incidents immediately. An employee is not expected to contact any individual who is involved in the alleged harassment. Supervisors and managers who receive a complaint of, or learn of, information that suggests this Policy may have been violated are required to promptly forward that complaint to Human Resources, and will be subject to discipline for failing to timely report. Consistent with Charter's Open Door Policy and Code of Conduct, any individual who believes that he/she has been the victim of harassment, has observed harassment or has been made aware of harassment should report the incident in any of the following ways:

- contact his/her supervisor or department leader;
- contact his/her local Human Resources representative; or
- contact EthicsPoint at **1-866-384-4277** or <https://chartercommunications.ethicspoint.com>.

Retaliation Is Strictly Prohibited

We recognize that employees may find it difficult to raise complaints about harassment. Charter strictly prohibits and has a zero tolerance for retaliation against any individual who in good faith reports a concern of harassment, or who seeks advice or raises a question regarding harassment or misconduct of any kind. There shall be no adverse employment action directed toward any employee for honestly communicating their concern of harassment, or toward an employee for participating in an investigation or for otherwise cooperating in the investigation of a harassment concern. Retaliation is a serious violation of this Policy and, like harassment itself, will be subject to disciplinary action.

Prompt Investigation

All concerns of harassment will be promptly investigated by an individual(s) who has been appropriately trained and is qualified to conduct such investigations. Because delays in reporting concerns may inhibit Charter's ability to conduct an effective and thorough investigation, employees are required to report all incidents of harassment immediately. Investigations will be thorough and unbiased, and individuals who report harassment will be treated with respect and dignity. Employees must cooperate and provide truthful information in an investigation.

Appropriate Action

Charter will not tolerate any harassment, discrimination, and retaliation by supervisors, managers, coworkers, customers, or vendors of Charter, nor will Charter tolerate harassment or discrimination by an employee of any vendor. Individuals alleged to have engaged in harassment may be removed from the workplace while an appropriate investigation is being conducted. An employee found to have engaged in harassment, discrimination or retaliation in violation of this Policy will be subject to corrective action, up to and including termination.

Training

Within 90 days of hire, employees must complete Charter's mandatory on-line anti-harassment training, and any subsequent training at times designated by Charter or as required by law.

5.0 CONTACTS

Questions regarding this Policy should be addressed to your immediate supervisor or Human Resources representative.

To report harassment via Charter's compliance and ethics hotline, contact:

EthicsPoint

<https://chartercommunications.ethicspoint.com> or 1-866-384-4277