

**People Policy Document:**  
**Equal Employment  
Opportunity Policy**

Version 1.0



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## Revision History

Date	Version	Description	Author	Reviewed By	Approved By
7/3/2023	1.0	Baselined	HR – Policies& Processes	PePG	HR Operations

## Contents

1.0 Objective .....	4
2.0 Scope .....	4
3.0 Definitions .....	4
3.1 Disability .....	4
4.0 Guidelines .....	4
4.1 Employment practices covered .....	4
4.2 Policy on Nepotism.....	4
5.0 Responsibilities .....	5
6.0 Authority .....	5

## 1.0 Objective

This policy provides that all aspects of human resource management be conducted without regard to race, color, religion, gender, age, national origin, disability, or political affiliation.

It is the policy of UST to prohibit:

- Employment discrimination on the basis of race, color, national origin, religion, caste, creed, gender (including pregnancy, childbirth or related medical conditions), age, political affiliation, or against otherwise qualified persons with disabilities.
- The lowering of bona fide job requirements, performance criteria, or qualifications in order to give preference to any USassociate or applicant for employment on the basis of the above prohibitions.
- All USassociates, including Heads, Managers, and Supervisors from taking retaliatory action against any person making allegations of violations.

## 2.0 Scope

This policy applies to UST and any subsidiary entities of UST within the United States of America.

## 3.0 Definitions

### 3.1 Disability

An individual is considered to have a disability if that individual either:

- Has a physical or mental impairment, which substantially limits one or more of his or her major life activities
- Has a record of such an impairment.

## 4.0 Guidelines

### 4.1 Employment practices covered

The prohibition against employment discrimination applies to all aspects of the hiring process and employment practices, including:

- Hiring, demotion, promotion, role change, in-band adjustment, separation and transfer
- Application of performance management and employee development
- Application of corrective actions, including disciplinary actions; and
- Compensation, pay practices, and other terms, conditions, and privileges of employment.

### 4.2 Policy on Nepotism

It is the policy of UST not to discriminate in its employment and personnel actions with respect to its employees and applicants based on marital or familial status. UST permits the employment of qualified relatives of employees of the employee's household or immediate family as long as:

- Such employment does not create actual conflicts of interest.
- USassociates do not influence the hiring decision of managers involved in the hiring process of the spouse, child, stepchildren, parent, stepparent, grandparent, grandchild, brother, sister, half-brother, half-sister, aunt, uncle, niece, nephew, parent-in-law, daughter-in-law, son-in-law, brother-in-law and sister-in-law or any other individual related by blood, marriage or adoption, of such USassociate.
- USassociates who are related by blood, marriage, or under any of the instances mentioned above,

or reside in the same household have no direct reporting or supervisor to subordinate relationship. In other words, no USassociate is permitted to work within “the chain of command” when one relative’s work responsibilities, salary, hours, career progress, benefits or other terms and conditions of employment could be influenced by such USassociate.

- Employees who marry while employed or become part of the same household are treated in accordance with these guidelines. Where a conflict arises as a result of the relationship, one of the employees may be transferred to another department/ team at the earliest practicable time.

## 5.0 Responsibilities

- All Managers and other USassociates are responsible for ensuring the prevention of any abovementioned form of workplace discrimination.
- Center Heads, Managers, and Supervisors are responsible for their center's compliance with this policy, and for the consistent application of this policy.
- Support of equal employment opportunity initiatives shall be considered in the evaluation of each manager's job performance.
- All USassociates are responsible for conducting themselves in a manner consistent with this policy.

## 6.0 Authority

Human Resource Group reserves the right to revise or revoke this policy

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boundless  
impact

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