

**Wizeline Inclusion & Anti-Harassment Policy**

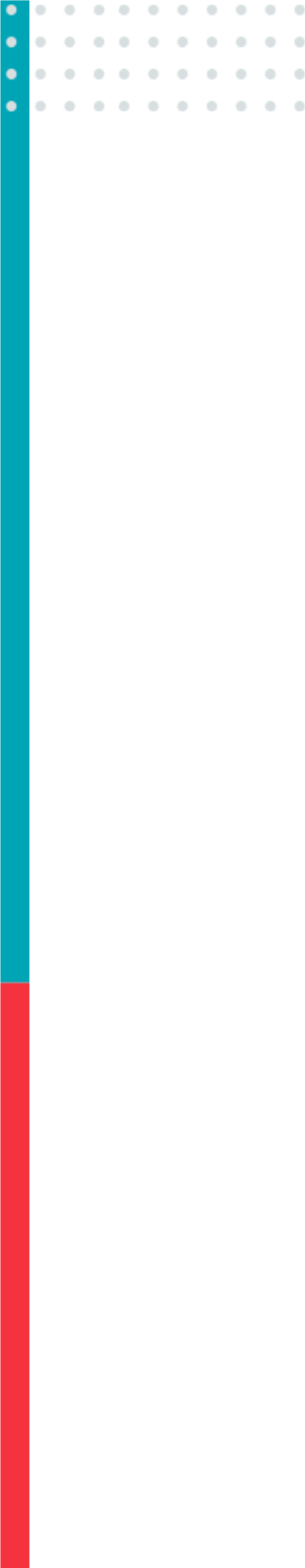


|  |  |
| --- | --- |
| **Document Owner** | Wizeline |
|  |  |
| **Revision** | 1 |
|  |  |
| **Last updated** | July 13, 2021 |
|  |  |
| **Owner** | Ana Cristina Ramírez |
|  |  |

Copyright © 2020 Wizeline All rights reserved.



Privileged or confdential information may be contained in this document and may be subject to legal privilege. Access to this document by anyone other than the intended is unauthorized. The content of this document is for informational purposes and subject to change without notice. No part of this publication may be reproduced, stored, or distributed without prior written permission of Wizeline1

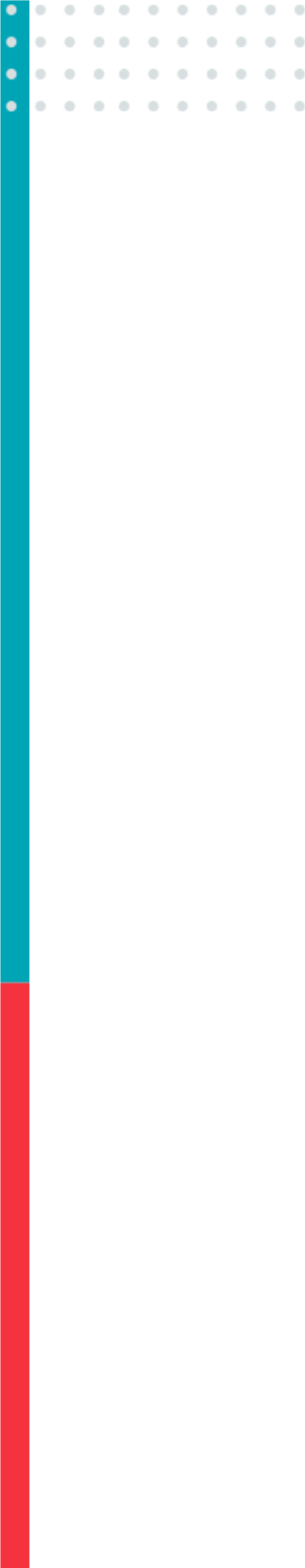


**Contents**

|  |  |
| --- | --- |
| Wizeline’s Vision for Inclusion | **2** |
| [Purpose](#page3) | [**2**](#page3) |
| [Expectations and Policy](#page3) | [**2**](#page3) |
| [Why is this policy important?](#page7) | [**6**](#page7) |
| [Eligibility](#page7) | [**6**](#page7) |
| [Procedures](#page7) | [**6**](#page7) |
| [Retaliation](#page9) | [**7**](#page9) |
| [Disciplinary Action](#page9) | [**7**](#page9) |
| [Summary](#page9) | [**8**](#page9) |
| [Read Receipt](#page10) | [**8**](#page10) |



**Page 2** • 2020 Wizeline - Wizeline Inclusion & Anti-Harassment Policy| All Rights Reserved INTERNAL ONLY - DO NOT DISTRIBUTE



**Wizeline’s Vision for Inclusion**

Wizeline creates and fosters a diverse, inclusive, and harassment-free workplace in which all can achieve their full potential, leading to company, customer, and community success. Wizeliners freely contribute ideas, empathize with each other, provide constructive feedback, and can identify and address what prevents them from being included or respected.

All are welcome here.

**Purpose**

Wizeline celebrates, honors, and embraces diversity and we believe it is essential to build and maintain a work community in which every person's safety, dignity, and autonomy are respected. As a result, Wizeline is frmly committed to providing an inclusive and harassment-free work environment for everyone, including underrepresented minorities, regardless of gender identity and expression, sexual orientation, disability status, physical appearance, ethnicity, nationality, racial afliation, age, religion, or social identity. Wizeline does not tolerate harassment of its employees in any form. We take all violations of our anti-harassment policy seriously and will respond to all claims of harassment swiftly and appropriately.

\*California Wizeliners: please refer to [this website](https://www.dfeh.ca.gov/legal-records-and-reports/laws-and-regulations/) to learn about and review California-specifc policies and procedures related to discrimination, harassment, and retaliation.

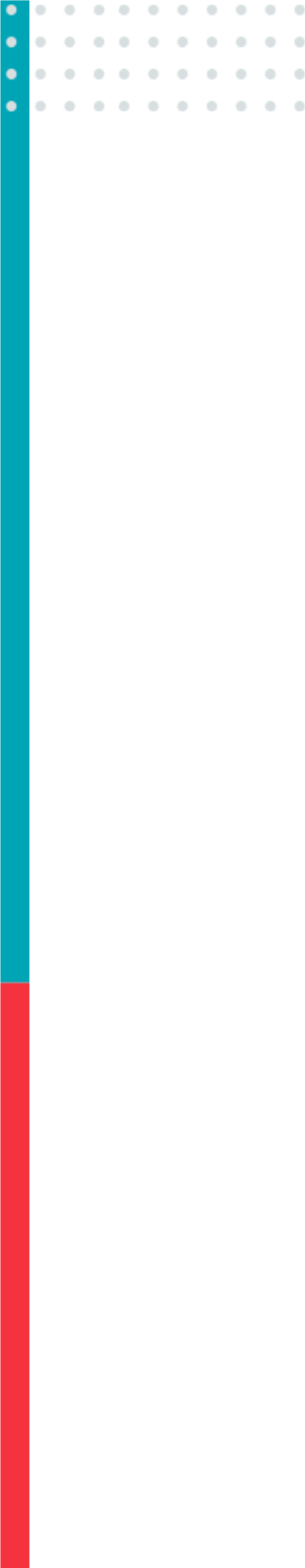
**Expectations and Policy**

As a Wizeline employee, you are expected to:

1. Be inclusive and empathetic. We want to create an excellent experience for everyone within the Wizeline community: our employees, job candidates, customers, partners, vendors, suppliers, independent contractors, and others (e.g., within our community and with neighbors in shared workspaces). Treat everyone with respect. Acknowledge that everyone deserves to participate in, contribute to and enjoy the Wizeline experience without fear of harassment, discrimination,



**Page 3** • 2020 Wizeline - Wizeline Inclusion & Anti-Harassment Policy| All Rights Reserved INTERNAL ONLY - DO NOT DISTRIBUTE

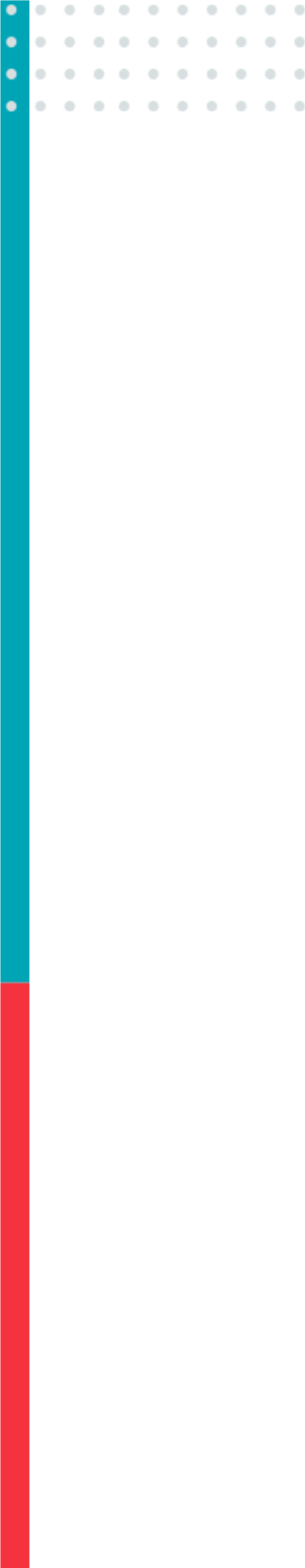


bullying, stereotyping, or condescension, whether blatant or via microaggressions (everyday verbal or nonverbal negative messages or insinuations). While we encourage fun and humor at Wizeline, jokes should not demean others or make people feel uncomfortable. Practice the platinum rule: treat others the way they want to be treated.

1. Speak up. If you hear or see something that does not support our company values and anti-harassment policy, we encourage you to take action. Individuals who make you or others feel uncomfortable may not be aware of how what they are saying or doing is ofensive or inappropriate. Taking action can mean anything from anonymously submitting a complaint (see “Procedures” section of this policy) to telling a manager about inappropriate conduct to explaining how their behavior runs counter to our values. We strongly encourage you to educate others, politely, about Wizeline’s values and help enforce our anti-harassment policy. Please contact your manager or a member of the People Operations team immediately if you face or witness harassment.
2. Actively participate in making Wizeline a harassment-free workplace. Do not engage in or tolerate harassment or discrimination. Harassment includes, but is not limited to, verbal language related to gender identity and expression, sexual orientation, disability status, physical appearance, ethnicity, nationality, race, age, religion, social identity, or other protected categories and underrepresented minorities. Forms of harassment include, but are not limited to, sexual imagery, deliberate intimidation, stalking, following, harassing photography or recording, ofensive verbal language, inappropriate physical contact, and unwanted sexual attention. Displays of harassment include both in person as well as digitally, whether through emails, text messages, video-conferences, social media channels, etc.
3. Practice Wizeline’s core values. Company culture is based on underlying attitudes and espoused values. As a Wizeline employee, you contribute to our company culture by living the following commitments:
   * We hire incredibly talented people and we help them to achieve their potential.
   * We exceed expectations, are ethical, and deliver value.
   * We develop great products that make other companies better.
   * We support innovation and experimentation.



**Page 4** • 2020 Wizeline - Wizeline Inclusion & Anti-Harassment Policy| All Rights Reserved INTERNAL ONLY - DO NOT DISTRIBUTE



* We are building a proftable company that does well and does good.

Our anti-harassment policy stands to support these core values, which shape our company culture and enable us to do our best work.

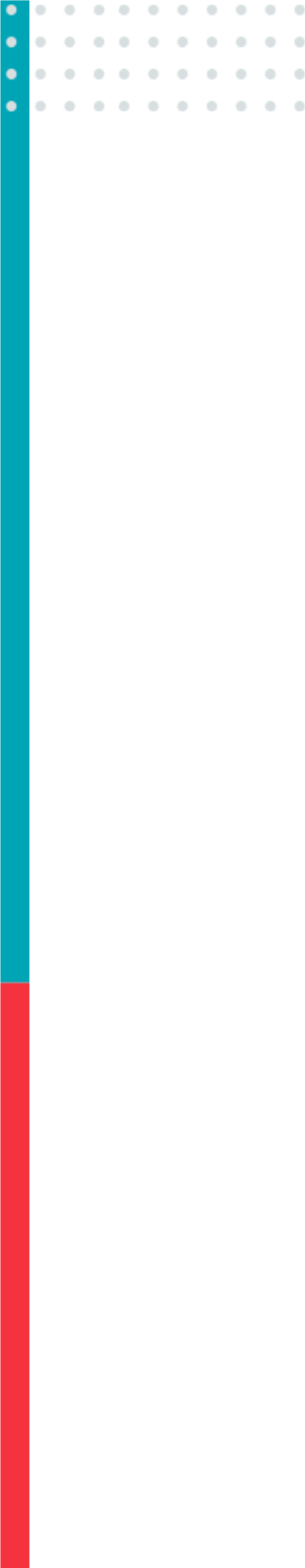
Harassment includes a broad spectrum of conduct, including harassment and/or bullying based on gender identity, expression, sexual orientation, race, age, religion, marital status, position, stature, or disability.

Examples of unacceptable behavior include:

* Unwanted sexual advances including verbal propositions, requests, comments, or sexual advances
* Ofering an employment beneft (such as a job, raise, promotion, or assistance with one’s career) in exchange for sexual favors, or threatening an employment detriment (such as termination, demotion, or disciplinary action) for an employee’s failure to engage in sexual activity
* Leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, or posters
* Sharing sexually-related text messages, emails, videos, or messages via social media during work hours or on company social media
* Unwelcome physical conduct, such as touching, sitting too closely, assault, or impeding or blocking movement
* Physical aggression or abuse of any kind
* Verbal abuse, hateful/hurtful language, or intimidating or threatening a person by spoken word or online
* Graphic commentaries about an individual’s body, sexually degrading words used to describe an individual, or suggestive or obscene messages, notes, or invitations
* Verbal denigration concerning a person’s characteristics such as vocal pitch, facial hair, or the size or shape of a person’s body, including remarks that imply that a male is too feminine or a woman is too masculine
* Making ofensive jokes or teasing others (e.g., because of their physical appearance, race, nationality, social identity, etc.) by spoken word or online
* Spreading malicious rumors or gossip



**Page 5** • 2020 Wizeline - Wizeline Inclusion & Anti-Harassment Policy| All Rights Reserved INTERNAL ONLY - DO NOT DISTRIBUTE



* Excluding or isolating someone socially (e.g., forming allies that isolate or exclude others, silencing individuals or not responding to them)
* Belittling a person’s opinions or contributions
* Undermining or deliberately impeding a person’s work (e.g., withholding information or purposefully giving wrong information)
* Tampering with a person’s belongings, work equipment, or workspace in an unwanted manner

In order to create a truly inclusive workplace, Wizeline discourages you from making fun of others such as unwanted jokes and nicknames based on physical appearances.

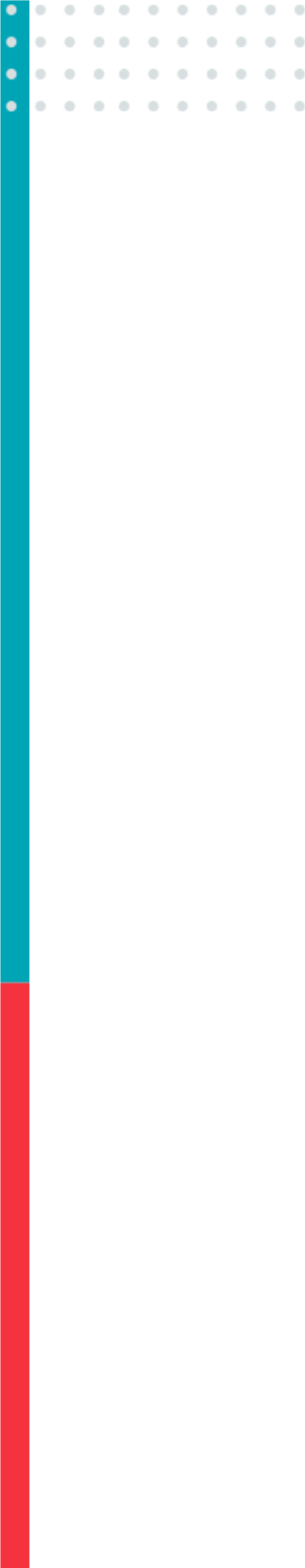
Furthermore, Wizeline prohibits employees from engaging in any activity related to the sex trade and human trafcking when traveling for business or as any part of a business, team, or customer activity - whether or not this activity is legal in that country.

Examples of appropriate behavior include:

* Ofering a polite compliment that is not sexual or ofensive in nature (e.g., positive reinforcement regarding professional activities)
* Holding the door or elevator open for someone
* Inquiring whether someone enjoyed a religious holiday they celebrated
* Ofering congratulations on a recent wedding, anniversary, or other celebration
* Ofering to help a person carry a heavy item
* Celebrating national holidays and ethnic traditions
* Good-natured fun and humor
* Dispelling rumors and refusing to engage in gossip
* Helping to ensure that your colleagues' voices are heard and that everyone feels comfortable to speak up and contribute ideas
* Maintaining professionalism and minimizing disruption when engaging in a consensual, romantic relationship with a coworker who is not your manager or report



**Page 6** • 2020 Wizeline - Wizeline Inclusion & Anti-Harassment Policy| All Rights Reserved INTERNAL ONLY - DO NOT DISTRIBUTE



If you have any questions about what constitutes inclusive behavior or inappropriate behavior, please contact a member of the People Operations team.

**Why is this policy important?**

Harassment, both in-person and online, is unfortunately common. This ofcial policy aims to prevent harassment by identifying and defning expectations and making it clear that harassment, for any reason, is not acceptable within the Wizeline community.

**Eligibility**

This policy applies to all Wizeline employees, including the CEO and executive staf, all managers, employees (full-time and part-time), and interns. Wizeline prohibits its employees from harassing co-workers as well as our customers, clients, vendors, suppliers, independent contractors, and others doing business with us. In addition, Wizeline prohibits customers, vendors, suppliers, independent contractors, and others doing business with the company from harassing Wizeline employees.

**Procedures**

Reporting harassment

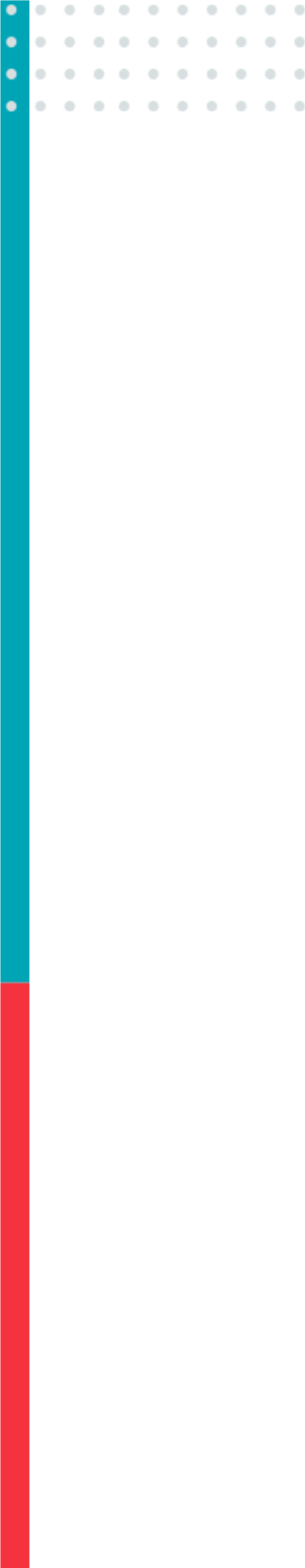
Wizeline strongly encourages prompt reporting of conduct that may violate this policy. Any individual, not just the person experiencing harassment in a given situation, should make a report under this policy, including an E-Staf member, manager, employee, guest, or another third party. Taking a stand of zero tolerance, Wizeline will carefully review every allegation of violations of the policy, including actions that may be perpetrated by employees, vendors, clients or other external stakeholders.

If you experience, observe or hear about harassment at Wizeline, there are three primary ways to report it:

1. Contact the regional People Operations Leader:
   * Ana Cadiñanos ([ana.cadinanos@wizeline.com](mailto:ana.cadinanos@wizeline.com)) in EMEA.
   * April Lanier ([april.lanier@wizeline.com](mailto:april.lanier@wizeline.com)) in the USA.
   * Cristina Ramírez ([cristina.ramirez@wizeline.com](mailto:cristina.ramirez@wizeline.com)) in Mexico and Americas.
   * Tammy Ho ([tam.ho@wizeline.com](mailto:tam.ho@wizeline.com)) in APAC.
   * Maria Alejandra Avella ([maria.avella@wizeline.com](mailto:maria.avella@wizeline.com)) in Colombia.



**Page 7** • 2020 Wizeline - Wizeline Inclusion & Anti-Harassment Policy| All Rights Reserved INTERNAL ONLY - DO NOT DISTRIBUTE



Email the regional People Operations leader with a description of the incident, who was involved, when it occurred, and any other information you think is helpful to provide. This will make it so that:

* 1. There is a written record of the report.
  2. The corresponding Pops Leader can follow up swiftly and determine how to handle your report without disclosing your identity.
  3. You can stay informed about the progress of an investigation that may occur. Please note that your report will be treated with the utmost confdentiality. As a fnal note, if you didn't feel comfortable raising a concern to the local Pops Leader, please consider scaling the situation to Cristina Ramírez ([cristina.ramirez@wizeline.com](mailto:cristina.ramirez@wizeline.com)), VP of People Operations.

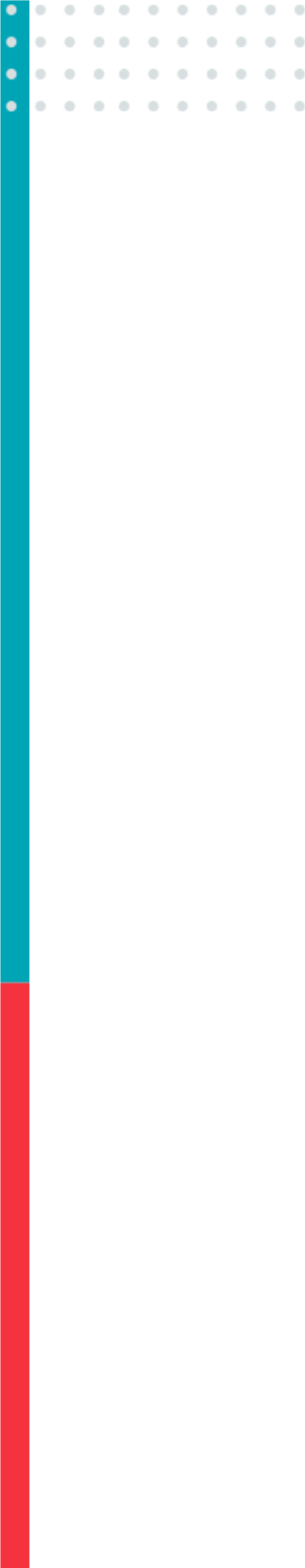
1. To maintain your anonymity (if you do not want your identity to be associated with the complaint), fll out [this Google form](https://docs.google.com/a/wizeline.com/forms/d/1wtBS_gFFqmbzeekSVtu6zlgYA3wWvBmZaKqfS1Ngqlg/edit), which will be viewable by Cris Ramírez , VP of People Operations. Please keep in mind that this anonymity means there is no way for People Operations to contact you directly about your report or the progress of an investigation.
2. Contact a People Ops team member immediately via email, Slack, or phone (check [BambooHR](https://wizeline.bamboohr.com/home/) for names and contact information). Your People Ops team members are your partners in maintaining an inclusive workplace and have a responsibility to keep information private and confdential.
3. The Ethics Hotline:

The ethics hotline is an easy way to ask questions and share concerns about potential violations of our code of conduct in a confdential and anonymous way. Our ethics hotline is hosted by EthicsPoint and operated by NAVEX Global, an independent third party company who specializes in providing these services. More information on the ethics hotline and how to make a report can be found [here](https://secure.ethicspoint.com/domain/media/en/gui/82302/index.html).

All complaints of harassment that are reported to a People Ops team member, will be investigated in a fair, timely, thorough, and impartial manner. Corrective action will be taken where warranted. All complaints of harassment that are reported to management, or to the People Operations team, will be treated with as much confdentiality as possible.



**Page 8** • 2020 Wizeline - Wizeline Inclusion & Anti-Harassment Policy| All Rights Reserved INTERNAL ONLY - DO NOT DISTRIBUTE



**Retaliation**

You will not be penalized in any way for reporting a harassment problem. Wizeline strictly prohibits retaliation and adverse action against those who report, oppose or participate in an investigation of alleged violations of this policy. Participating in an investigation of alleged wrongdoing at Wizeline includes:

* Associating with another employee who is engaged in any of these activities.
* Making or fling an internal complaint with the company regarding the alleged unlawful activity.
* Providing informal notice to Wizeline regarding the alleged unlawful activity.

If you feel that you are being retaliated against, or if you observe retaliation by a colleague, manager, customer, or others, please immediately contact a member of the People Operations team.

**Disciplinary Action**

Violation of this policy will subject the individual(s) to disciplinary action, up to and including termination (and applicable legal action as appropriate).

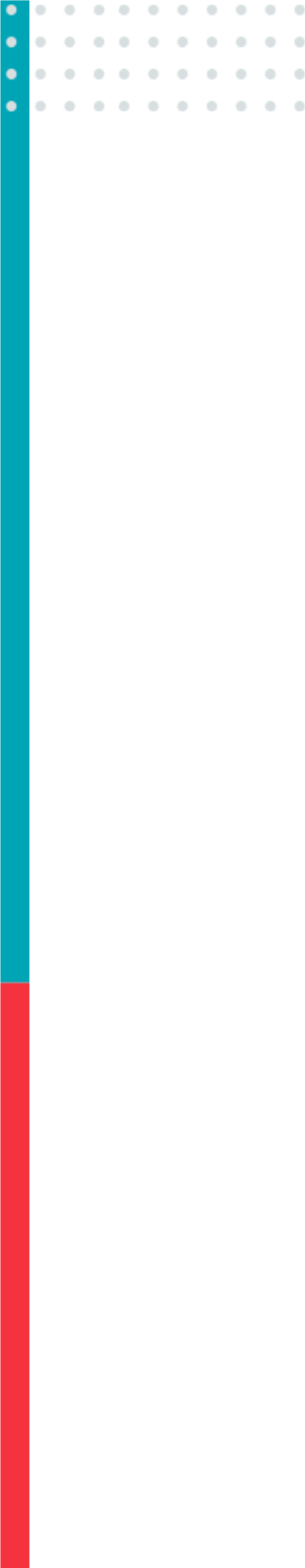
**Summary**

* In order to maintain an inclusive, safe, and productive work environment at Wizeline, treat everyone with respect. Be mindful of what you say and how you act and this efect on others.
* It is essential that you report any and all incidents that you believe violate this policy.
* Those who condone or ignore potential violations of this policy will be subject to appropriate disciplinary action, up to and including termination.
* If you’re unsure about what constitutes harassment or a violation of this policy, consult management or a member of the People Operations team.

This policy is meant to empower and protect you. If you feel that this policy needs improvement, please contact a member of the People Operations team and ofer your feedback and suggestions.



**Page 9** • 2020 Wizeline - Wizeline Inclusion & Anti-Harassment Policy| All Rights Reserved INTERNAL ONLY - DO NOT DISTRIBUTE



**Read Receipt**

I have read this policy in full and understand its contents.



**Page 10** • 2020 Wizeline - Wizeline Inclusion & Anti-Harassment Policy| All Rights Reserved INTERNAL ONLY - DO NOT DISTRIBUTE