

ANTI-DISCRIMINATION & ANTI-HARASSMENT POLICY

This Global Anti-Discrimination & Anti-Harassment Policy (“**Policy**”) is formulated the common understanding of what JTB considers discrimination and harassment, and aims to raise awareness among its employees of their rights and responsibilities pertaining to the issue.

DISCLAIMER: This Policy provides the general guidelines of JTB’s expectations governing employee conduct and is not intended to and does not create a contract between JTB and its employees. JTB reserves the right to add, change, or delete any provision herein, and make exceptions deemed appropriate in its discretion.

I COMMITMENT TO A POSITIVE WORK ENVIRONMENT FREE OF DISCRIMINATION AND HARASSMENT

JTB is firmly committed to the principle of equal employment opportunity and to providing a professional work environment in which every employee, job applicant, customer, vendor, delivery or service personnel, and the public is treated with respect. JTB will take immediate and appropriate action to prevent and correct employee behavior that violates this Policy.

JTB WILL NOT TOLERATE ANY AND ALL FORMS OF DISCRIMINATION OR HARASSMENT BY AND BETWEEN EMPLOYEES AND MEMBERS OF THE PUBLIC.

EACH AND EVERY EMPLOYEE IS RESPONSIBLE FOR MAINTAINING A POSITIVE WORK ATMOSPHERE THAT IS FREE OF DISCRIMINATION AND HARASSMENT.

II. DEFINITION OF DISCRIMINATION AND HARASSMENT

“**Discrimination**” in the workplace occurs when equally qualified individuals are treated differently based on “personal characteristics” that are unrelated to their ability to perform the required work, *e.g.*, race/color, national origin/ancestry,

sex/gender identity/sexual orientation, religion/belief, disability, age, marital status, etc.¹

“**Harassment**” is one form of discrimination that occurs under the following two circumstances:

(1) “**Abuse of Power (Quid-Pro-Quo) Harassment**” occurs when an individual who has the authority to grant or deny “tangible job benefits” (e.g., employment, promotion, pay rise, benefits, etc.) or impose “adverse employment actions” (e.g., discipline, pay cut, demotion, termination, etc.) to/upon the victim

- (a) asks the victim to do/not do something based on reasons that are irrelevant to the job function, and
- (b) based on the victim’s answer, grants or denies the victim a tangible job benefit or foregoes an adverse employment action are typical abuse of power harassments.

DISCLAIMER: JTB recognizes that each country has a different set of personal characteristics protected under its laws. As it is impossible to list all of them, this Policy sets forth some of the fundamental personal characteristics which JTB considers irrelevant to an individual’s ability to perform most jobs. Conflict with Law of each country: That being said, JTB also understands that laws pertaining to discrimination vary significantly among countries. Thus, JTB will not hold employee in violation of this Policy if adherence to its provisions would constitute violation of each country’s law or differentiation based on a certain personal characteristic is permitted thereunder.

(2) “**Hostile Work Environment Harassment**” occurs when there is unwelcome, unsolicited conduct that has the purpose or effect of:

- (a) violating the dignity of the victim; or
- (b) creating a work environment that a reasonable person would consider offensive, uncomfortable, hurtful, demeaning, degrading, belittling, humiliating, embarrassing, intimidating, hostile, abusive, threatening, or annoying.

IV. JTB’S NO DISCRIMINATION POLICY

It is JTB’s policy to provide equal employment opportunity in conformance with all applicable laws and regulations to individuals who are qualified to perform the necessary job requirements. As such, JTB strictly prohibits making “employment decisions,” however small, based on an individual’s personal

characteristics” that are **not job-related and necessary to the operation of the business**.

Personal Characteristic	Individuals Shall Not Be Discriminated Based On Their
Race/Colour	<ul style="list-style-type: none"> • Race; • Characteristics associated with a certain race • Conditions which predominantly affect a certain race; • Pigmentation, complexion, and/or skin shade or tone, etc. • Cultural practices or characteristics often linked to race or ethnicity
National Origin/Ancestry	<ul style="list-style-type: none"> • Birthplace; • Ancestry; • Culture; • Surname associated with a certain national origin; • Linguistic characteristics common to a certain ethnic group; • Accent; • Foreign citizenship (with work authorisation); etc. <p><u>Note:</u> National Origin/Ancestry differs from race or citizenship.</p>
Sex	<ul style="list-style-type: none"> • Sex; • Pregnancy, childbirth, or a related medical condition; • Lactation; • Gender identity • Sexual orientation, etc.

Religion/Belief	<ul style="list-style-type: none"> • Religious beliefs; • Religious observances and practices
Disability	<p>Individuals who have the skill, experience, education, or other requirements to perform the essential functions of the job cannot be treated unfavourably ably because of:</p> <ol style="list-style-type: none"> (1) Disability (2) History of disability
	<ol style="list-style-type: none"> (3) Belief by others to have a physical or mental impairment, even if s/he does not have such an impairment; or (4) Known association or relationship with a disabled individual.
Age	<input type="checkbox"/> Chronological age.
Marital Status	<input type="checkbox"/> Marital status, history

<p>Across the Board</p>	<ul style="list-style-type: none"> • Stereotypes and assumptions about the abilities, traits, or performance of individuals of a certain personal characteristic, or non-conformance thereto; • Marriage to or association with individuals of a certain personal characteristic; • Membership in or association with organisations or groups based on a certain personal characteristic; • Attendance or participation in schools, places of worship, etc. generally associated with a certain personal characteristic; etc.
<p>Other</p>	<p>Each country has a different set of personal characteristics protected under its laws.</p>

V. JTB'S NO HARASSMENT POLICY

JTB will not tolerate any form of harassment by and between employees (including managers), job applicants, customers, vendors, delivery or service personnel, and/or members of the public, regardless of whether or not such conduct constitutes unlawful harassment under applicable local law. JTB prohibits any and all forms of harassment not only in the workplace, but at any location where JTB employees are present, whether during or outside normal working hours.

A. Forms of Hostile Work Environment Harassment

Hostile Work Environment Harassment may occur in **Verbal, Non-Verbal, and Physical** forms, which includes but is not limited to: jokes; comments; intrusive questioning about a person's domestic circumstances, relationships; slurs; epithets or name calling; ridicule or mockery; innuendo; gossip; insults or put-downs; negative stereotyping; intimidation or threats; unfair allocation of work; exclusion from normal work place/class conversation or activities; objects

or pictures; graffiti; electronic, visual, written or graphic material circulated within or posted within the workplace; interference with work performance; gestures; physical assaults or threats; and/or other verbal non-verbal, or physical conduct; and/or incitement of others to commit any such acts.

Simple teasing, offhand comments, or isolated incidents that are not very serious, will become prohibited harassment when it is so frequent or severe that it creates a hostile or offensive work environment or when it results in an adverse employment decision (such as the victim being fired or demoted).

B. Prohibited Harassment (Non-exclusive)

1. Harassment on the Basis of Sex

a. Sexual Harassment

Unwelcome sexual advances, requests for sexual favours, and other verbal, non-verbal, or physical conduct of a sexual nature constitute sexual harassment when: (1) Used as **abuse of power (quid-pro-quo)**; or (2) Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating a **hostile work environment**. Depending on the situation, sexual harassment may include, but is not limited to, the following behaviour:

- (i) **Abuse of Power (Quid-Pro-Quo):** Forcing, pressuring and/or

intimidating an employee into submitting to sexual conduct in return for preferential treatment. Specifically, the harasser, who has authority over the victim employee, conditions the victim's receipt of a "tangible employment benefit" or foregoes an "adverse employment action" based upon the victim's submission to sexual conduct or in exchange for sexual favours.

- (ii) **Hostile Work Environment Sexual Harassment**

- (a) **Verbal conduct, e.g.:**

- (1) Sexually explicit comments, jokes or innuendos;
- (2) Suggestive remarks or sounds;
- (3) Teasing or nicknames;
- (4) Unwanted comments on dress and appearance;
- (5) Sexually degrading remarks or words;
- (6) Questions about sexual conduct;
- (7) Gossip of a sexual nature;
- (8) Unwelcome flirtations or requests for dates;
- (9) Using foul or obscene language;
- (10) Demeaning comments about women/men in general;
- (11) Any sexual advance or propositioning;

- (12) Repeated attempts to establish a relationship with an individual, who
 - by word or conduct in any way indicates that such action is not welcome;
- (13) Leaving offensive voice-mails;
- (14) Verbal threats; etc.
- (b) **Non-verbal conduct, e.g.:**
 - (1) Sexually offensive gestures;
 - (2) Downloading of pornographic or sexually exploitative and degrading material onto a computer;
 - (3) Sending/circulating/displaying of materials of a sexual nature (including pornographic or suggestive posters, photographs, pictures, drawings, cartoons, objects, offensive letters, poems, e-mails, texts, etc.).
- (c) **Physical conduct, e.g.:**
 - (1) Sexual acts by force, pressure, and/or intimidation;
 - (2) Unwelcome kissing, hugging, pinching, rubbing, groping, touching;
 - (3) Leering;
 - (4) Ogling;
 - (5) Obscene gestures;
 - (6) Invasion of personal space, etc.

b. Sexual Orientation Harassment

Sexual Orientation Harassment is any behaviour pertaining to sexual orientation that, whether deliberate or otherwise, creates a hostile work environment. "Homophobia" is a term used to describe unreasonable hatred and rejection of homosexuality, and may be directed against individuals or groups of people who are/are thought to be gay, lesbian, bisexual or transgendered.

c. Pregnancy/Maternity Harassment

Pregnancy/Maternity Harassment involves harassment of a woman, because of her pregnancy, childbirth, lactation, or a medical condition related to pregnancy or childbirth.

2. Leave Harassment

Leave Harassment involves harassment, of an individual who takes leave of absence that is provided under applicable local law or company policy.

3. Age Harassment

Age Harassment may include, in addition to harassment based on chronological age in the forms set forth in Section III and V. A above, : assumptions regarding the individual's inability to learn due to chronological age; offensive remarks about a person's age; exclusion on the basis of age, etc.

4. Race/Colour/National Origin/Ancestry Harassment

Racial/Colour/National Origin/Ancestry Harassment includes any behaviour pertaining to race/colour/national origin/ancestry (including citizenship and ethnic origins) that, whether deliberate or otherwise creates a hostile work environment.

5. Religious Harassment

Religious Harassment is any behaviour deliberate or otherwise, pertaining to religion, religious belief or other similar philosophical belief that, whether deliberate or otherwise, creates a hostile work environment. Religious Harassment may occur based on four factors:

- a. Affiliation:** An individual's affiliation with a particular religious or ethnic group.
- b. Physical or cultural characteristics and clothing:** An individual's physical, cultural, or linguistic characteristics (e.g., accent or dress associated with a particular religion, ethnicity, or country of origin).
- c. Perception:** The perception or belief that an individual is a member of a particular racial, national origin, or religious group, whether or not that perception is correct.
- d. Association:** An individual's association with a person or organisation of a particular religion or ethnicity.

6. Disability Harassment

Disability Harassment is any behaviour pertaining to the fact that a person has a physical or mental impairment, learning difficulty, or disfigurement, that creates a hostile work environment, whether deliberate or not.

7. Bullying/Moral Harassment/Power Harassment

JTB defines bullying/moral harassment/power harassment (collectively, "**bullying**") as "(a) a persistent pattern of mistreatment and offensive, intimidating, malicious or insulting behaviour; an abuse or (b) misuse of power through means intended to undermine, humiliate, denigrate or harm the recipient."

JTB considers the following types of behaviour examples of bullying:

a. Abuse of Power

- (i) Setting impossible deadlines or imposing intolerable workload burdens;
- (ii) Persistent unjustified criticism;
- (iii) Public humiliation;
- (iv) Withdrawing responsibilities or decision-making powers without good reason or explanation;
- (v) Work interference (*i.e.*, sabotage, which prevents the individual's work from getting done.)

b. Hostile Work Environment

(i) Verbal bullying:

- (a) Verbal intimidation;
- (b) Slandering, ridiculing or maligning a person or his/her family;
- (c) Persistent name calling that is hurtful, insulting or humiliating;
- (d) Using a person as the target of jokes;
- (e) Abusive and offensive remarks;
- (f) Intimidation (e.g., threats, derisory remarks).

(ii) Physical bullying:

- (a) Physical intimidation, assault or threat of physical assault, pushing, shoving, kicking, poking, tripping;
- (b) Damage to a person's work area or property.

(iii) Gesture bullying:

- (a) Nonverbal threatening gestures or glances that convey threatening messages.

(iv) Unwarranted Exclusion:

- (a) Socially or physically excluding or disregarding a person in work-related activities.

VI. JTB'S NO RETALIATION/VICTIMISATION POLICY

"Retaliation/Victimisation" occurs when an employee is subject to "materially adverse action" due to his/her opposition to and/or report/complaint about unlawful discrimination/harassment or participation in an investigation therefor. JTB strictly prohibits any and all forms of retaliation/victimisation. "Materially adverse action" must be at the level where it would dissuade a reasonable worker from opposing/report unlawful discrimination/harassment, or

participating in an investigation therefor. Examples of “materially adverse action” include, but are not limited to: negative employment actions (pay cut, change in job assignments, demotions, layoffs, termination, denial of training, fringe benefits, etc.), other actions affecting employment negatively (threats, unjustified negative evaluations, unjustified negative references, or increased surveillance), and any other actions that would serve such purpose (assault, unfounded civil or criminal charges, etc.).

VII. PREVENTION OF DISCRIMINATION AND HARASSMENT

A. Tell Harasser to Stop Unless Situation is Volatile

In many situations, harassers think they are just being funny or friendly, and do not realise how unwelcome their conduct is. In other situations, acting in such manner may be the only way the harasser knows to interact with people.

Silence suggests that the individual accepts the harassing behaviour.

B. Duty to Report

Employees do not need to deal with discrimination, harassment and/or retaliation alone. JTB is committed to taking appropriate steps to prevent, correct, and end unlawful discrimination and/or harassment.

Revision History

Version	Detail	Date
1.0	Newly developed	2015/1/30
1.1	Updated in accordance with Japanese version 2018	2018/9/28
2.0	Updated in accordance with reestablishing JTB Group Policy	2023/4/01