



Sexual and Other Discriminatory Harassment

Statement	The Company, as well as its subsidiaries, affiliates and related companies recognizes that employees should be able to work in an environment free from any form of illegal discrimination, including sexual harassment and other types of discriminatory harassment.
Policy	<p>It is the policy of the Company that sexual harassment and other discriminatory harassment on the basis of race, religious creed (including religious dress and grooming practices), color, sex (including pregnancy, childbirth, breastfeeding, or a related medical condition), national origin (including language use and possession of a driver's license issued to persons unable to prove their right to be present in the United States under federal law), age, familial or marital status, ancestry, citizenship, genetic information, gender (including gender identity, gender expression and gender stereotyping) sexual orientation, veteran or military status, being a qualified individual with a disability, physical disability, mental disability, medical condition (including cancer and genetic characteristics) or other status protected by federal, state and/or local laws will not be tolerated. The Company complies with all federal, state and/or local sexual and discriminatory harassment laws, regulations and ordinances.</p> <p>The prohibition against harassment applies in all work-related settings and activities, whether on or off Company premises. This policy also applies to contractors, customers, clients, vendors, unpaid interns or volunteers. If such conduct occurs, prompt and appropriate corrective action, including the issuance of discipline up to and including termination, may be taken to eliminate the harassment. Senior Management of BNY Mellon is committed to ensuring that this policy is followed at all levels of the organization.</p>
Sexual Harassment Definition	<p>Sexual harassment is defined as any intentional or unintentional unwelcome sexual advances, with or without touching; coerced sexual acts; requests or demands for sexual favors or other verbal or physical conduct of a sexual nature made by an employee, customer, client or vendor when:</p> <ul style="list-style-type: none">• submission or rejection to such conduct is made, either explicitly or implicitly, a term or condition of employment,• submission to or rejection of such advances, requests or conduct by an individual is used as the basis for employment decisions affecting the individual or• such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile, humiliating or offensive work environment.
Discriminatory Harassment Definition	<p>Discriminatory harassment is defined as verbal or physical conduct that denigrates or shows hostility on the basis of race, religious creed (including religious dress and grooming practices), color, sex (including pregnancy, childbirth, breastfeeding, or a related medical condition), national origin (including language use and possession of a driver's license issued to persons unable to prove their right to be present in the United States under federal law), age, familial or marital status, ancestry, citizenship, genetic information, gender (including gender identity, gender expression and gender stereotyping) sexual orientation, veteran or military status, being a qualified individual with a disability, physical disability, mental disability, medical condition (including cancer and genetic characteristics) or other status protected by federal, state and/or local laws when such conduct has the purpose to effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile, humiliating or offensive environment.</p>
Complaints	<p>Any employee who believes there has been a violation of this policy, whether or not he/she is the perceived victim, should promptly present the complaint orally or in writing to any appropriate level of management or Human Resources with whom he/she feels comfortable. An investigation will be conducted by a qualified, impartial individual and, if appropriate, corrective action will be taken against the appropriate parties. Refer to the full policies posted on the BNY Mellon Intranet site for further information.</p>
Protection from Retaliation	<p>Employees or applicants who allege or report policy violations or who cooperate in an investigation shall not be subjected to reprisal, recrimination, retaliation or the threat of such action.</p>
Responsibility	<p>The Global Head of HR Governance and Employee Relations is responsible for this policy.</p>
Questions	<p>This is a summary of the policy. For detailed information, refer to the full policy posted on the BNY Mellon Intranet site. Alternatively, employees may contact their direct questions to The HR Contact Center at 1-800-947-4748 (HR4U) or HR_Help@bnymellon.com.</p>