

Statement of Respect and Anti-Discrimination and Harassment Policy

Date Revised: 12/18/2025

What You Need to Know

We all must work together to establish and maintain a professional work environment free of illegal discrimination and harassment.

Your responsibilities are to:

- Be respectful of others' differences by treating others respectfully and professionally and acting with honesty and integrity;
- Avoid conduct or behavior that is racist, sexist or biased against an individual's inherent characteristics;
- Immediately report behavior or conduct in violation of this policy;
- Not retaliate;
- Ensure any guest, vendor, or temporary worker for whom you are responsible acts in a professional, respectful manner when onsite or engaging with anyone on a MassMutual campus or performing work on behalf of MassMutual;
- Cooperate with any MassMutual investigation; and
- If you're a manager or supervisor and observe or receive a complaint of behavior or conduct that violates this policy, report the information immediately to the appropriate party listed below.

MassMutual's responsibilities are to:

- Establish, foster, and maintain a professional, respectful work environment in which employees and others working with MassMutual continually demonstrate that they respect the right to opinions, attitudes, attributes, and feelings that may be different than their own;
- Provide a work environment that is free from all forms of discrimination and harassment, including sexual harassment, where everyone can feel confident to bring their full and true self to work;
- Educate managers and employees in the prevention and elimination of behavior or conduct in violation of this policy;
- Maintain an environment and culture that embraces this policy;
- Conduct a prompt, discrete, and thorough investigation in response to a good faith complaint of behavior or conduct in violation of this policy;
- Ensure that no individual who makes a good faith complaint or who has cooperated with an investigation pursuant to this policy suffers retaliation;
- Hold all individuals accountable to this policy, including appropriately disciplining individuals who violate this policy;
- Communicate this policy to employees annually; and
- Educate employees on its process for investigating complaints.

Additional Information

Complaints

If you are subjected to or observe any behavior or conduct that you believe violates this policy, report your concerns immediately as outlined in the [Speaking Up policy](#). There are a variety of methods you may use. You may report any behavior or conduct that you believe violates this policy to:

- your manager;
- another manager (in the event your manager is engaged in the inappropriate conduct/behavior);
- [Employee Relations](#);
- the [Compliance & Ethics Reporting Hotline](#) (which allows you to report anonymously);
- the [Compliance & Ethics Department](#);
- your [Law](#) contact; or
- a state or federal agency, for discrimination, harassment or retaliation claims (see additional resources and FAQs for more detail).

Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. MassMutual will promptly, discretely, and thoroughly investigate all claims of alleged discrimination and harassment and will take prompt corrective action, if appropriate.

Other Details

Applies To

This policy applies to you if you are an employee of one of the following companies (collectively "MassMutual"), including when you are acting on behalf of other MassMutual subsidiaries or affiliates:

- Massachusetts Mutual Life Insurance Company

This policy applies to MassMutual employees who work for a MassMutual field agency or firm.

This policy also applies to temporary or contract workers and interns ("temporary employees").

Definitions

Discrimination - When an employment decision (like hiring, promotion or compensation) is based on a person's status as a member of a certain class of people rather than on the basis of the person's qualifications or individual abilities, such as:

- age, ancestry, citizenship status, color, disability (mental or physical), gender, gender identity or expression, genetic information, marital status, national origin, protected veteran status, race, religion, sex, sexual orientation, pregnancy or a pregnancy-related condition.

Federal and state (and sometimes local) laws prohibit discrimination in employment and define the specific groups to which these prohibitions apply. While this policy is based on Federal and Massachusetts law, the laws of the applicable jurisdiction will apply if different.

For purposes of this policy, we will refer to these as the protected classes.

Harassment - Verbal or physical conduct or behavior that attacks the character or reputation of, or shows hostility or aversion toward, an individual because of:

- that person's protected class;
- the protected classes of the person's relative, partner, friend or associate; or
- that person's participation in activities identified with the interests of people who are members of a protected class.

Actions are considered harassing if they have the purpose or effect of:

- creating an intimidating, hostile or offensive working environment;
- unreasonably interfering with an individual's work performance; or
- otherwise adversely affecting an individual's employment opportunities.

Harassing conduct or behavior can take many forms, including verbal, written, electronic, or graphic material, and includes the following examples:

- bullying (including cyberbullying/stalking);
- epithets, slurs or negative stereotyping;
- jokes;
- innuendoes;
- derogatory comments about appearance or lifestyle;
- cartoons;
- pranks;
- acts that are threatening, intimidating, sexual in nature or hostile; or
- exclusion of particular employees or groups if there is no legitimate business basis for such exclusion.

Retaliation - When an individual who, in good faith, has made a complaint of discrimination or harassment, or who has cooperated with an investigation of such claims, experiences an adverse action because of the complaint or cooperation.

Sexual Harassment - A type of harassment based on sex, sexual orientation, gender, gender identity or expression. By law, unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct or behavior of a sexual nature constitute sexual harassment when:

- submission to or rejection of such conduct or behavior is made explicitly or implicitly as a term or condition of employment;
- submission to or rejection of such conduct or behavior is used as the basis for any employment decision, such as favorable reviews, promotions, raises, bonuses, increased benefits, and work assignments; or
- such conduct or behavior has the purpose or effect of unreasonably interfering with an employee's work performance by creating an intimidating, hostile or offensive work environment.

Sexual harassment can occur between any individuals. In some situations, conduct that occurs between coworkers and external MassMutual business partners outside the workplace may be considered sexual harassment.

Speaking Up

You should report any violation, or other compliance, ethics or risk issues related to the policy, through the reporting channel that is the most appropriate or with which you are most comfortable. The reporting channels available to employees are set forth in the [Speaking Up policy](#).

Enforcement and Discipline

If you violate this policy, you may be subject to discipline, up to, and including, termination of employment. Civil or criminal penalties may also apply.

For temporary personnel who violate this policy, you may be subject to discipline, including termination of contract or business relationship, dismissal or prohibition from MassMutual property or events. Civil or criminal penalties may also apply.

Nothing in this policy is intended or should be construed to restrict, discourage or interfere with communications or actions protected or required by state or federal law or regulation.

Additional Resources

For more information about this policy, contact:

- Your manager
- [Compliance & Ethics Department](#)
- [Employee Relations](#)
- [Law](#)
- [Enterprise Risk Management](#)
- [Corporate Audit](#)

Additional information for employees working in New York:

- [New York Procedures](#)
- [New York Complaint Form](#)
- New York employees can call 1-800-427-2773 to receive free legal counseling regarding any complaint of workplace sexual harassment or to submit a sexual harassment complaint.