

Harassment and Discrimination Policy

White Mountains strives to maintain an environment free from discrimination and harassment, where employees treat each other with respect, dignity and courtesy.

This policy applies to all phases of employment, including but not limited to recruiting, testing, hiring, promoting, demoting, transferring, laying off, terminating, paying, granting benefits and training.

Prohibited Behavior

White Mountains does not and will not tolerate any type of discrimination or harassment of our employees, applicants for employment, or our customers. Discriminatory conduct or conduct characterized as harassment as defined below is prohibited.

The term harassment includes, but is not limited to, slurs, jokes, and other verbal or physical conduct relating to a person's race, ethnicity, color, religion, sex (including pregnancy), sexual orientation, age, marital status, national origin, ancestry, citizenship, gender (including gender nonconformity and status as a transgender or transsexual individual), disability or handicap, past, current or prospective service in the uniformed services, genetic information or any other status that is protected by federal, state or local law, that unreasonably interferes with a person's work performance or creates an intimidating, hostile work environment.

"Genetic information" includes:

- Information about an individual's genetic tests
- Information about the genetic tests of a family member
- Family medical history
- Requests for, and receipt of, genetic services by an individual or a family member
- Genetic information about a fetus carried by an individual or family member, or about an embryo legally held by the individual or family member using assisted reproductive technology

The Massachusetts Pregnancy Fairness Act and Connecticut Act Concerning Pregnant Women in the Workplace prohibit discrimination based on pregnancy-related conditions. Employees and applicants for employment may request a reasonable accommodation for pregnancy, childbirth or related medical or common conditions to enable them to perform the essential functions of their job. In accordance with federal, state or local laws concerning pregnant women in the workplace, a reasonable accommodation will be provided unless the accommodation will impose an undue hardship on the Company's business operations.

Sexual harassment is a form of illegal sex discrimination. Sexually harassing behavior in particular includes unwelcome conduct such as: sexual advances, requests for sexual favors, offensive touching, or other verbal or physical conduct of a sexual nature. Such conduct may constitute sexual harassment when it:

- is made an explicit or implicit condition of employment
- is used as the basis for employment decisions
- unreasonably interferes with an individual's work performance
- creates an intimidating, hostile or offensive working environment

The types of conduct covered by this policy include demands or subtle pressure for sexual favors accompanied by a promise of favorable job treatment or a threat concerning employment.

Specifically, it includes sexual behavior such as:

- repeated sexual flirtations, advances or propositions
- continued and repeated verbal abuse of a sexual nature, sexually related comments and joking, graphic or degrading comments about an employee's appearance or displaying sexually suggestive objects or pictures including cartoons and vulgar e-mail messages
- any uninvited physical contact or touching, such as patting, pinching or repeated brushing against another's body

Such conduct may constitute sexual harassment regardless of whether the conduct is between members of management, between management and staff employees, between staff employees, or directed at employees by nonemployees conducting business with the Company, regardless of gender.

Harassment by Nonemployees

White Mountains will also endeavor to protect employees, to the extent possible, from reported harassment by nonemployees in the workplace, including customers, clients and suppliers.

Complaint Procedure and Investigation

If you believe you are being harassed, send out a clear and consistent signal to the harasser that the behavior is unwelcome and report it immediately to your manager. If the manager is unavailable or you believe it would be inappropriate to contact that person, you should immediately contact the Corban OneSource, Human Resources at 844-726-7226 or any other member of management. You can raise concerns and make reports without fear of reprisal or retaliation.

White Mountains will conduct a prompt investigation as confidentially as possible under the circumstances. Employees who raise concerns and make reports in good faith can do so

without fear of reprisal; at the same time, employees have an obligation to cooperate with White Mountains in enforcing this policy and investigating and remedying complaints.

Anyone found to have engaged in such wrongful behavior will be subject to appropriate discipline, which may include termination.

Massachusetts Employees:

In addition to utilizing the Company's internal complaint procedures, employees who believe that they have been sexually harassed may file a complaint with the federal Equal Employment Opportunity Commission (EEOC) and/or the Massachusetts Commission Against Discrimination (MCAD). Both the EEOC and the MCAD serve as neutral fact finders and attempt to help the parties voluntarily resolve disputes. To file a charge or obtain more information, you may contact the MCAD by mail or telephone at One Ash Burton Place, Rm. 601, Boston, MA 02108, (617) 994-6000, 436 Dwight Street, Rm. 220, Springfield, MA 01103, (413) 739-2145, or 455 Main Street, Room 100, Worcester, MA 01608, (508) 799-8010. For the EEOC office nearest you, call 1-800-699-4000.

Retaliation

Any employee who files a complaint of harassment or other discrimination in good faith will not be adversely affected in terms and conditions of employment and will not be retaliated against or discharged because of the complaint.

In addition, we will not tolerate retaliation against any employee who, in good faith, cooperates in the investigation of a complaint. Anyone who engages in such retaliatory behavior will be subject to appropriate discipline, up to and including termination.