



---

# Equal Employment Opportunity Policy

## 1.0 INTRODUCTION

Packaging Corporation of America (“PCA”) is an equal opportunity employer. We prohibit discrimination or harassment based upon the following: race, color, age (40 and over), national origin or ancestry, citizenship status, religion, sex (including pregnancy, childbirth and related medical conditions), sexual orientation, gender, gender identity, gender expression, marital status, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member status or any other status protected by state or local law. This policy applies to all terms and conditions of employment, including but not limited to recruiting, hiring, promotion, transfer, termination, layoff, leaves of absence, compensation and training.

In addition to promoting a work environment free of discriminatory and harassing conduct and behavior, PCA also maintains a respectful work environment. Finally, any retaliation against an individual who has either complained about discrimination, harassment, or disrespectful conduct and behavior or who has cooperated with an investigation of such a complaint, is similarly unacceptable and will not be tolerated.

## 2.0 NO DISCRIMINATION OR HARASSMENT

We adopt and expect the following:

- 2.1 That the workplace be respectful; therefore, it is a violation of PCA policy for any supervisor, co-worker, vendor, client, or customer of PCA to discriminate against or harass a PCA employee by creating an intimidating, hostile or offensive working environment through unwelcome teasing or gestures, verbal abuse, name calling, threats, or conduct that demeans, humiliates or intimidates.
- 2.2 That it is impermissible for any supervisor, co-worker, vendor, client, or customer of PCA to sexually harass a PCA employee. Sexual harassment means sexual advances, requests for sexual favors and verbal or physical conduct of a sexual nature when:
  - submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or
  - such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual’s work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

The following are some examples of conduct and behavior which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness.

- unwelcome sexual advances, such as sexual flirtations or propositions, regardless of whether they involve physical touching;
- leering, whistling, sexual gestures, suggestive or insulting comments;
- sexual epithets, jokes and written or oral references to sexual conduct, experiences, activities, deficiencies, or prowess;
- graphic comments about an individual's body;
- sexually degrading words used to describe an individual; and
- display in the workplace of sexually suggestive objects, pictures or cartoons.

Direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increase, promotions, increased benefits, or continued employment constitutes sexual harassment. In addition, other sexually oriented conduct, whether intended or not, that is unwelcome and has the effect of creating an intimidating, humiliating, hostile or offensive working environment may also constitute sexual harassment.

### **3.0 REPORTING PROCEDURE**

Any employee who believes he or she has been the subject of discrimination, harassment or disrespectful conduct and behavior should immediately report the situation. Additionally, any employee who is aware of any harassment, discrimination or disrespectful conduct and behavior directed against others, should also immediately report the situation. A report can be made through any of the following means:

- A member of the management team;
- Your Human Resources Manager;
- The Corporate Human Resources Department; or
- The Employee Concerns Hotline

### **4.0 COMPLAINT INVESTIGATION**

When we receive a complaint we will promptly investigate the allegation in a fair and expeditious manner. The investigation will be conducted to maintain confidentiality to the extent practicable under the circumstances, and will be conducted by someone other than the individual(s) identified as having potentially engaged in the improper conduct or behavior. When we have completed our investigation, we will, to the extent appropriate, inform the person filing the complaint and person alleged to have committed the conduct or behavior of the results of our investigation.

If we determine that a violation of this policy has occurred, remedial action will be taken which may include appropriate disciplinary action up to and including separation of employment.

The Equal Employment Opportunity Commission (EEOC) and similar state and local agencies will accept and investigate charges of unlawful discrimination or harassment at no charge to the complaining party.

## **5.0 PROTECTION AGAINST RETALIATION**

Retaliation against any individual who has utilized this complaint procedure is strictly prohibited. Prohibited retaliation, includes but is not limited to, separation of employment, constructive discharge, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Any employee who believes he or she has been subject to retaliation should report the conduct or behavior in accordance with Section III Reporting Procedure.

## **6.0 CONCLUSION**

PCA encourages any employee who believes he or she has been subjected to unlawful discrimination, harassment or disrespectful treatment to report the matter. Retaliation by any employee based upon an employee's report of discrimination or harassment, or an employee's participation in an investigation of such conduct, will not be permitted or tolerated. We trust that all PCA employees will continue to act responsibly to maintain a professional working environment free of discrimination, harassment and disrespect. The Company encourages any employee to raise questions he or she may have regarding any of these issues with the appropriate management personnel.

Employees may report a matter of concern by leaving a confidential voicemail message on the Corporate Human Resources hotline: (847) 604-3070. If an employee leaves their phone number, a representative of the Corporate Human Resources Department will contact them within one (1) business day.

Revised January 1, 2023