



Policy on the Prevention of Harassment, Discrimination and Retaliation

Issued by:	Executive Committee
Place, Date of Introduction	Baar-Zug, 31 December 2005
Last update:	9 July 2018 (last reviewed on 10 February 2020)
Area of validity:	Partners Group worldwide

Table of Contents

1.	Introduction	3
2.	Scope of application.....	3
3.	Equal Employment Opportunity	3
3.1.	Reporting.....	4
4.	Harassment, Discrimination and Retaliation Prevention	4
4.1.	Commitment and expectations	4
4.2.	Harassment	4
4.3.	Prohibition Against Retaliation	6
5.	Reporting and investigation	6
5.1.	Reporting responsibilities and procedures	6
5.2.	Investigation Process and Disciplinary Measures	7

1. Introduction

Partners Group Holding AG and its affiliates ("Partners Group" or the "Group") are committed to providing equal employment opportunities and complying with applicable anti-harassment and anti-discrimination laws. This Policy is built upon the Partners Group Charter and outlines Partners Group's expectations regarding employee respect, civility and professionalism.

The Group is committed to enforcing this Policy. **The effectiveness of Partners Group's efforts depend in part on employees reporting inappropriate workplace conduct.** If you feel that you or someone else may have been subjected to conduct that violates this Policy, you should report it immediately. If employees do not report harassing or discriminatory conduct, Partners Group may not become aware of a possible violation of this Policy and may not be able to take prompt and appropriate corrective action.

The Group's Human Resources team is responsible for administration of this Policy and reviews it periodically. Any questions regarding this Policy or questions about discrimination, harassment, accommodations, or retaliation (termed "victimisation" in the UK) that are not addressed in this Policy, please contact Human Resources.

This Policy does not form part of any contract of employment and Partners Group may amend it at any time.

2. Scope of application

This Policy applies to all employees, officers, and other workers over whom the Group has control (all of whom are referred to in this document as "employees") of Partners Group.

3. Equal Employment Opportunity

Partners Group is an equal opportunity employer and complies with all applicable fair employment practices laws. In order to provide equal employment and advancement opportunities to all individuals, Partners Group endeavours to make all employment decisions based on merit, qualifications, and abilities. This commitment prohibits unlawful discrimination by any employee or agent of Partners Group. This governs all aspects of employment, including, but not limited to, selection, job assignment, promotion, compensation, training, grievance, discipline, termination and benefits.

Partners Group prohibits discrimination in employment opportunities or practices on the basis of any consideration made unlawful by federal, state or local laws, including (but not limited to) age, race, color, national origin or ancestry, sex (including pregnancy, childbirth or related medical conditions, and breastfeeding), religion or belief, creed, citizenship, marital status, family care status, physical or mental disability, genetic information, sexual orientation, gender, gender identity or expression, gender reassignment, transsexual or transgender status, political belief, military or veteran status, or employment status.

The Group complies with applicable federal, state or local disability laws¹. Consistent with such compliance, Partners Group will provide reasonable accommodation to an employee or job applicant, unless doing so would cause significant difficulty or expense for the Group. A reasonable accommodation is any change in the work environment to help an individual with a disability to apply for a job, perform the essential duties of a job, or enjoy the benefits and privileges of employment. If you believe you need an accommodation, please make a request to the Group's Human Resources team.

3.1. Reporting

If an employee or applicant believes this Equal Employment Opportunity Policy has been violated, he or she should follow the same reporting steps as detailed in Section 5.1 (Reporting Responsibilities and Procedures).

4. Harassment, Discrimination and Retaliation Prevention

4.1. Commitment and expectations

Partners Group is proud of its professional and congenial work environment, and will take all necessary steps to ensure that the work environment is free from discrimination based on legally-protected characteristics and harassment. This Policy applies to interactions with individuals with whom Partners Group employees have a business, service, or professional relationship, including clients, vendors, and visitors. It also extends to inappropriate preferences expressed by or to clients or customers based on protected characteristics. Partners Group will use reasonable endeavours to prevent and promptly correct work-related harassment by employees and non-employees over whom it has control.

Partners Group will not tolerate any form of harassment or prohibited discrimination for any reason and such action may subject the offender to disciplinary action (including immediate termination of employment without notice, pay or payment in lieu of notice, as the case may be and in accordance with applicable laws) or other liability for any such conduct.

4.2. Harassment

Harassment includes verbal, physical and visual conduct that violates an employee's dignity or creates an intimidating, hostile or offensive work environment or that unreasonably interferes with work performance.

¹ Including, but not limited to, the Americans with Disabilities Act ("ADA"), as amended by the ADA Amendments Act, and all applicable state or local law.

It is not easy to define exactly what actions or course of conduct will constitute harassment in any particular circumstance because it will depend on the specific factual circumstances, including how pervasive, abusive or serious the behavior is.

Such conduct constitutes harassment when:

- submission to the conduct is made either an explicit or implicit condition of employment, continued employment or re-employment;
- submission to or rejection of the conduct is used as the basis for an employment decision;
- refusal to submit to the conduct results in limiting, segregating or classifying the employee which in any way would discriminate, deprive or diminish employment opportunities or otherwise adversely affect the employee; or
- it interferes or would with an employee's work performance or creates or would create an intimidating, hostile, or offensive work environment.

Typical examples of harassment include (but are not limited to):

- verbal conduct such as derogatory statements, slurs, jokes, gestures or teasing regarding legally-protected characteristics;
- physical conduct directed at people or property, including unwelcome touching and assault, or physical interference with normal movement at work; and
- visual content such as posters, pictures, cartoons or drawings regarding characteristics.

It is important to note that petty slights, annoyances and isolated incidents (unless of an extremely serious nature) will not rise to the level of harassment. To be harassment, the conduct must create a work environment that would be intimidating, hostile, or offensive to a reasonable person.

Sexual harassment is a form of harassment based on a person's sex. Employees who believe they are experiencing sexual harassment are encouraged to inform the harasser that they find their conduct or behavior unwelcome or offensive.

Typical examples of sexual harassment include (but are not limited to):

- coerced sexual acts, unwelcome sexual advances, and express or implied requests for sexual favors in exchange for favorable reviews, assignments, promotions, or continued employment;
- unwelcome touching of or assaulting an individual's body, staring or leering in a sexual manner, or verbal commentary about an individual's body or sexuality;
- offensive jokes, slurs, language, epithets, gossip, conversations, comments or inquiries of a sexual nature or about a person's sex;
- unwelcome flirtations, advances, or propositions that are frequent or severe (such as, repeatedly asking an employee for a date after the employee has indicated that he or she is not interested) ; and
- sexually suggestive or obscene comments or gestures, or the display of graphic and sexually suggestive objects, pictures or graffiti.

It is important to remember that people have different perceptions of what is unwelcome, harassing or discriminatory, and employees must be sensitive to these differences.

All such conduct, regardless of form, is a violation of this Policy and may subject the harasser to discipline, up to and including immediate termination without notice, pay or payment in lieu of notice as the case may be and in accordance with applicable laws. Such conduct also may be a violation of applicable law(s), which may subject the harasser to personal liability.

Harassing behavior is unacceptable in the workplace, as well as in other work-related settings, such as business trips, business-related social events, other Group-related circumstances, and where behavior could impact the work environment (including, for example, behavior among employees outside of the workplace, if it could impact the work environment).

4.3. Prohibition Against Retaliation

No one will be subject to, and Partners Group prohibits, any form of discipline, reprisal, intimidation, or retaliation for good-faith reports or complaints about incidents of discrimination or harassment of any kind, pursuing any discrimination claim, or cooperating in related investigations.

Retaliation against any person for the good-faith reporting of harassment or discrimination or assisting in an investigation is a serious violation of this Policy and will be dealt with in accordance with Partners Group's disciplinary procedures.

Acts of potential retaliation should be reported immediately to the Group's Human Resources team in accordance with this Policy or by the reporting mechanisms outlined in Section 4 (Speaking up – How to report) of the [Speak-up Directive](#) (as amended).

5. Reporting and investigation

5.1. Reporting responsibilities and procedures

Every Partners Group employee is responsible for reporting and helping prevent harassment, discrimination and retaliation. Early reporting and intervention is the most effective method of resolving actual or perceived harassment or any form of discrimination and protecting all concerned.

If an employee feels that he or she has been harassed, discriminated or retaliated against, or has observed such behavior toward another person, he or she should promptly report the concern to:

- A member of the Group's Human Resources team;
- the manager of the employee; or
- via the reporting mechanisms outlined in Section 4 (Speaking up – How to report) of the [Speak-up Directive](#) (as amended).

Partners Group emphasizes that if the employee's manager is believed to be involved in the conduct deemed offensive, or the employee is otherwise uncomfortable speaking with his or her manager, the employee need not make the report to that manager and should either make

a report to the Group's Human Resources team or via the reporting mechanisms outlined in Section 4 (Speaking up – How to report) of the Speak-up Directive (as amended). Employees may raise good faith concerns without fear of reprisal.

Partners Group also encourages individuals to report acts by non-employees that are perceived to be in violation of this Policy, such as clients, vendors, contract personnel, other service providers and any other non-employees.

Employees that hold senior positions must also be aware of the influence they may have over other staff, and therefore such employees must clearly understand the boundaries and be particularly sensitive to inappropriate workplace conduct. Managers are responsible for ensuring that within their groups the working atmosphere is free of harassment, discrimination, and retaliation. **Managers and senior employees (AVP and above) that receive complaints or observe potentially harassing, discriminatory or retaliatory conduct, must immediately inform the Group's Human Resources team.** Failure to do so may result in discipline, up to and including immediate termination without notice, pay or payment in lieu of notice, as the case may be and in accordance with applicable laws.

5.2. Investigation Process and Disciplinary Measures

All reported allegations of harassment and discrimination will be promptly investigated in accordance with applicable federal, state, and local laws.

Where Partners Group determines that a violation of this Policy has, or likely has, occurred, Partners Group will take prompt and appropriate remedial action, including, where relevant, subjecting the offender to disciplinary action.

Although the specific discipline² in any given situation will be within the Group's discretion, such action may include, but is not limited to:

- review, instruction, and coaching relating to applicable policies;
- recording the incident in the offender's personnel file;
- verbal or written warning;
- demotion, or withholding of a promotion, discretionary bonus (unless unlawful under applicable federal, state or local laws) or other benefits;
- transfer to another department;
- temporary suspension without pay; and
- termination of employment (possibly without notice and possibly without pay in lieu of notice, as the case may be and in accordance with applicable laws).

² With regard to inappropriate conduct by clients, vendors or visitors, corrective action will be taken after consultation with the appropriate management personnel.

Partners Group will make every effort to handle complaints and investigations with sensitivity and consideration to the rights and concerns of the person who complained, as well as the rights of the claimed offender, and will endeavor to maintain confidentiality to the extent practical and appropriate in each case. Partners Group will take complaints seriously and investigate promptly and objectively. Partners Group will gather and review evidence to understand what has taken place and to form a view as to whether what has taken place could have reasonably caused offense or be a breach of this Policy. In order to conduct an effective investigation, Partners Group may need to discuss the allegations not only with the alleged offender, but also with potential witnesses. Employees must fully and truthfully cooperate in Partners Group's investigation of harassment, discrimination and retaliation complaints. Clear unfounded allegations made maliciously will be investigated and dealt with in accordance with Partners Group's disciplinary procedures.