

## ANTI-HARASSMENT POLICY

### We want to be a harassment-free workplace

Cars.com is committed to fostering a harassment-free workplace where everyone is treated with respect and dignity. We do not tolerate harassment that violates this policy in any form. You should be aware that it is not only against our policy, but it is illegal in most jurisdictions, to harass or otherwise discriminate against any individual because of any of the following factors:

- race
- religion or creed
- national origin or ancestry
- sex, pregnancy, sexual orientation, or gender (including gender nonconformity and status as a transgender or transsexual individual)
- marital status
- age
- physical or mental disability (actual or perceived)
- citizenship
- genetic information
- past, current, or prospective service in the uniformed services
- arrest record, expunged, or sealed convictions

This policy and the law cover any employee, applicant, contractor, intern, volunteer, manager, supervisor, officer, director, client, vendor, or any other third party encountered in connection with company business. We prohibit harassment in our offices, at company-sponsored events, and anywhere else between persons subject to this policy.

Harassment consists of any unwelcome conduct (verbal, visual, or physical), based on an individual's legally protected status or activity that affects the individual's terms or condition of employment, forms the basis for any employment decision regarding an individual, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive working environment, even if the conduct is not sufficiently severe or pervasive to violate the law. All employees have a personal responsibility to keep the workplace free of such harassment.

### Sexual Harassment

This policy prohibits harassment based on an individual's sex, sexual orientation, or gender (including pregnancy and status as a transgender or transsexual individual), regardless of the harasser's sex, sexual orientation, or gender. Sexual harassment includes harassment that is sexual in nature (for example, offensive remarks about an individual's sex, sexual orientation, or gender), as well as any unwelcome sexual advances, propositions, or requests for sexual favors. Depending upon the circumstances, sexual harassment may also include unwelcome sexually suggestive comments; sexually oriented kidding, teasing, or practical jokes; offensive gender-based comments; discussions of a sexual nature; foul or obscene language or gestures; displays of foul or obscene printed material, pictures, and photographs; derogatory sex related statements or sexually suggestive postings online or in any social media platform (including Facebook, Twitter, Instagram, Snapchat, etc.); and physical contact such as patting, pinching, grabbing, or brushing against another's body.

No officer, manager, or supervisor has the authority to request or require (either explicitly or implicitly) an employee or applicant to submit to sexual harassment as a condition of receiving any job benefit (such as a raise or a promotion) or avoiding any job detriment (such as a pay cut or a demotion). This prohibition against harassment includes any conduct of a sexual nature with the purpose or effect of unreasonably interfering with an employee's work performance by creating an intimidating, hostile, or offensive work environment.

### **Other Types of Harassment**

This policy also prohibits harassment based on an individual's race, religion, creed, national origin, ancestry, marital status, age (40 and over), physical or mental disability (actual or perceived), citizenship, genetic information, past, current or prospective service in the uniformed services, arrest record, expunged or sealed convictions, or any other characteristic protected under applicable federal, state, or local law.

Such harassment includes harassment that is: verbal (for example, epithets, slurs, or derogatory statements, comments, or jokes); physical (for example, assault or inappropriate physical contact); visual (for example, displaying derogatory posters, cartoons, drawings, or making derogatory gestures); or online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.).

### **Complaint Procedure**

Any person who believes that he or she has been a victim of a violation of this policy, or who witnesses or becomes aware of conduct that may violate this policy, should immediately report it to their supervisor, their supervisor's supervisor or any People Business Partner. Any manager or supervisor who observes or is advised of harassing conduct must also report the conduct. If you have any questions about the policy or a complaint, please contact a People Business Partner or the Chief People Officer. This policy does not require reporting prohibited conduct directly to anyone involved in the prohibited conduct.

The People Xperience Team will promptly, directly, and thoroughly investigate the facts and circumstances of all claims of perceived harassment and will take corrective action, if appropriate. Persons involved (including the reporting person, the targeted person (if different) and the alleged policy violator) generally will be offered an opportunity to be interviewed or to otherwise participate in the investigation. The investigation may also include interviews with any potential witnesses, as well as with others who may have relevant information. The investigation may also include a review of pertinent documents and other materials. The person making the complaint may be requested to put the complaint in writing to ensure that all possible violations are investigated.

In investigating and in imposing any corrective action, the company will preserve confidentiality to the extent possible. Employees involved in an investigation are expected to refrain from discussing it with co-workers.

### **No Retaliation**

This policy forbids anyone from adversely treating any covered person for: reporting (or assisting anyone reporting) harassment or retaliation; cooperating in an investigation of such conduct, or filing an administrative charge with a government agency.

## Violations of This Policy

Any employee, regardless of position or title, who is found to have subjected another individual to harassment or who retaliates against another person in violation of this policy will be subject to discipline, up to and including termination of employment.

## General

This policy does not create a binding contract and is not intended to restrict communications or actions protected or required by state or federal law. The examples listed are illustrative only, and not exhaustive. Employees are expected to use this procedure in a responsible manner and may be required to complete online or in-person training from time to time as a key component of our Anti-Harassment Program.

The People Xperience Team is responsible for the administration of this policy. We retain the right to modify the procedures set forth in this policy. If you have any questions regarding this policy or questions about harassment that are not addressed in this policy, please contact the People Xperience Team.

**Effective Date:** August 11, 2017

**Policy Contact:** Legal Department

**Applies to:** Cars.com, DealerRater and Dealer Inspire