

U.S. Discrimination and Harassment Policy

Discrimination and Harassment Policy



Controlled Document Type: Policy

1.0 Objective

This Policy establishes the commitment of Cheniere Energy, Inc. and its subsidiaries and affiliates (Company) to prohibit all forms of discrimination and harassment, including bullying in the workplace.

2.0 Scope

This Policy applies to all U.S. personnel and expatriate employees involved in the operation of the Company. It prohibits discrimination and harassment, including bullying by any employee of the Company, including managers, supervisors and co-workers, as well as by any person doing business with or for the Company such as vendors, suppliers, independent contractors, customers, and clients.

2.1 Location

This Policy applies wherever Company personnel perform work for or represent the Company.

2.2 Exceptions

There are no exceptions.

3.0 Policy

3.1 Policy Prohibiting Discrimination and Harassment

The Company prohibits all forms of discrimination and harassment on the basis of race, ancestry, color, age, national origin, ethnicity, religious creed or belief, sickle cell trait, physical or mental disability, marital or familial status, family responsibilities, matriculation, genetic information, military or veteran status (including the status of veterans who attend certain medical appointments), political activity or affiliation, sex (including pregnancy, childbirth, breastfeeding, or related medical condition), gender (including gender identity and gender expression), personal appearance, sexual orientation, citizenship status, protected activity (such as opposition to or reporting of prohibited discrimination or harassment), or any other status or classification protected by applicable federal, state, and/or local laws.

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Prohibited discrimination and harassment includes, but is not limited to, the following behavior:

- Verbal slandering, ridiculing or maligning a person, persistent name calling that is hurtful, insulting or humiliating, using a person as butt of jokes, or abusive and offensive remarks
- Written conduct, including voice mail messages, e-mails, text messages, or other written communication which conveys epithets, derogatory jokes or comments, graphic remarks, or slurs
- Visual conduct such as derogatory and/or sexually-oriented posters, photography, cartoons, drawings or gestures, or display of internet sites (including social networking sites)
- Physical conduct such as assault (or the threat of assault), intimidation, unwanted touching or sexual advances, blocking normal movement, or interfering with work performance because of sex, race, or any other protected characteristic
- Propositions or subtle pressure for sexual activities or persistent and unwelcome invitations for dates or other social activities
- Threats or demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss, and offers of employment benefits in return for sexual favors

In addition, prohibited conduct includes denying an individual access to a common restroom corresponding to their gender identity or harassing an individual because of a gender transition. Prohibited behavior includes intentionally and persistently failing to use the name and gender pronoun that correspond to the gender identity with which the individual identifies, and which they have communicated to management and employees.

3.2 Complaint Procedure

Company personnel who believe they have been victims of, or witnesses to, discrimination or harassment of any type must report their concern to their immediate supervisor or manager, to a supervisor or manager within their department, to Human Resources, or to the Hotline at (866) 207-4751, as soon as possible after the incident.

The report shall be specific and include the names of the individuals involved, the names of any witnesses, and any documentary evidence (e-mails, notes, text messages, voice mail messages, etc.).

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The Company shall preserve the confidentiality of complaints and allegations to the extent possible and disclose the details of those complaints only on a need-to-know basis. No action shall be taken that in any way penalizes an individual for making a complaint in good faith.

The Company shall take prompt action to appropriately investigate all concerns of discrimination, harassment, retaliation, or other conduct prohibited by this Policy. The person raising concerns shall be notified of the status of the investigation where possible.

3.3 Consequences of Conduct in Violation of this Policy

If the Company determines that this non-discrimination/non-harassment Policy has been violated, the Company shall take immediate and appropriate action. Depending upon the nature of the concerns and the results of the investigation, resolution may include informal/formal counseling, formal discipline, discharge, or other action.

3.4 Policy Prohibiting Retaliation

The Company shall not retaliate or take any form of reprisal against any individual (whether a witness or the victim) who in good faith reports any discrimination, harassment, or other conduct prohibited by this Policy or who participates in an investigation into such complaint or concern. Any such retaliation or reprisal by a Company employee, manager or supervisor is prohibited.

Retaliation may include, but is not limited to, treating differently any person believed or assumed to have reported a complaint or concern, or to have come forward with information about another person's complaint or concern, or subjecting them to different or adverse terms and conditions of employment.

Any individual who believes they have witnessed or been a victim of retaliation shall make an immediate report to Human Resources. In no case shall the Company tolerate retaliation. Any employee, supervisor or manager who retaliates against another employee or witness because of a complaint of discrimination, harassment, or other prohibited conduct, or because of participation in any investigation, shall be subject to discipline, up to and including termination of employment.

3.5 Policy Conflict

In the event of a conflict between this Policy and related supporting documents (e.g., procedures, instructions, and guidelines), the requirements in this Policy shall take precedence.

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4.0 Policy Governance

The Chief Human Resources Officer is the owner of this Policy and shall be accountable for ensuring compliance with Records and Information Management & Standards policies. The Company holds all property rights while owners have management accountability.

5.0 Recordkeeping

This Policy and all records generated from this Policy shall be managed and retained during their lifecycle according to the *Information Management Policy* and the *Records Retention Schedule*.

6.0 References

- Code of Business Conduct and Ethics
- Hotline Policy - CEI

7.0 Definitions

Term	Definition
Bullying	Repeated abusive conduct that is threatening, humiliating, intimidating, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others (the targets).
Discrimination	The unfair or prejudicial treatment of a person on the basis of race, age, sex or a protected category detailed above.
Harassment	Unwelcomed conduct that becomes unlawful when enduring the offensive conduct is a condition of continued employment or is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.
Sexual Harassment	Unwelcomed sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature.