

TEGNA

Harassment

We commit to our employees that the work environment will be free from all forms of discrimination. This includes harassment on the basis of federally protected categories, including, but not limited to, race, color, religion, sex (including pregnancy among others) national origin, disability, genetic information, and age (over 40). This also includes harassment on the basis of protected categories pursuant to applicable state and/or local laws.

This policy and the law forbid any employee, manager, supervisor, officer, director, client, vendor, or any other third party that an employee encounters in connection with Company business, to harass, discriminate, or retaliate against any Company employee, applicant, or intern, on the basis of any legally protected status or activity.

The conduct prohibited by this policy, whether verbal, physical, or visual, includes any discriminatory employment action and any unwelcome conduct that is inflicted on someone because of that individual's protected status. Among the types of unwelcome conduct prohibited by this policy are epithets, slurs, negative stereotyping, intimidating acts, and the circulation or posting of written or graphic materials that show hostility toward individuals because of their protected status. TEGNA prohibits that conduct in the workplace, even if the conduct is not sufficient to constitute unlawful harassment.

Conduct, in the workplace, at work-related activities, and when socializing with coworkers, clients and customers outside the workplace, whether intentional or unintentional, that results in harassment, will not be condoned. Calls, texts, emails, and social media usage can constitute inappropriate workplace harassment, even if they occur away from the workplace premises, on personal devices, or during non-work hours.

Anyone who feels they have been subjected to harassment should immediately report the incident pursuant to the complaint procedure set forth below.

Sexual Harassment

Sexual harassment deserves special mention. Harassing conduct based on gender often is sexual in nature but sometimes is not. This policy forbids harassment based on gender regardless of whether the offensive conduct is sexual in nature. Any unwelcome conduct based on gender is also forbidden by this policy regardless of whether the individual engaged in harassment and the individual being harassed are of the same or are of different genders.

Sexual harassment is strictly prohibited by TEGNA. Unwelcome sexual advances, requests for sexual favors, and other verbal, physical, or visual conduct based on sex constitute unlawful sexual harassment when: (1) submission to such conduct is made, either explicitly or implicitly, a term or condition of employment; (2) submission to or rejection of such conduct is used as a basis for any employment decision; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

No employee shall threaten or suggest, either directly or indirectly, that another employee's refusal to submit to sexual advances will adversely affect the employee's continued employment, evaluation, compensation, assignment, advancement, or any other aspect of employment. Similarly, no employee shall promise or suggest, either directly or indirectly, that another employee's submission to sexual advances will result in the improvement of a term or condition of employment for the employee.

Other sexually harassing conduct is also prohibited. This includes (1) offensive sex-oriented verbal kidding, teasing or jokes, (2) repeated unwanted sexual flirtations, advances or propositions, (3) verbal abuse of a sexual nature, (4) graphic or degrading comments about an individual's appearance or sexual activity, (5) offensive visual conduct, including leering, making sexual gestures, the display or dissemination of offensive sexually suggestive objects or pictures, cartoons or posters, (6) unwelcome pressure for sexual activity, (7) offensively suggestive or obscene letters, emails, notes or invitations, (8) offensive physical contact such as patting, grabbing, pinching, or brushing against another's body, and (9) sexual favoritism.

A superior, subordinate, coworker or anyone in the workplace including an independent contractor, temporary agency worker, vendor, client, customer or visitor can engage in sexual harassment.

This policy forbids harassment based on sex regardless of whether it rises to the level of a legal violation.

Supervisory Responsibilities

Supervisors and managers at all levels are responsible to ensure that the work environment is free from sexual and other forms of harassment. Managers and supervisors who learn of sexual harassment (or harassment based on any other protected characteristic or discrimination), be it a complaint, personal observation, or any other source, are required to immediately notify a human resources representative.

In addition to being subject to discipline, up to and including an unpaid suspension or termination, and/or other appropriate corrective action if they engage(d) in discriminatory, harassing or retaliatory conduct themselves, supervisors and managers will be subject to discipline, up to and including an unpaid suspension or termination, and/or other appropriate corrective action for failing to report suspected discrimination, harassment or retaliation, or otherwise knowingly allowing discrimination, harassment or retaliation to continue.

Policy Against Retaliation

TEGNA forbids that any employee treat any other employee or former employee or applicant adversely for reporting harassment, discrimination, or retaliation, for assisting another employee or applicant in making a report, for cooperating in an investigation into such alleged conduct, or for filing an administrative claim with the EEOC or a state governmental agency. All employees who experience or witness any conduct they believe to be retaliatory are to immediately follow the reporting procedures below

Complaints and Investigation Procedure

Any person who feels they have been subjected to behavior that may constitute discrimination, sexual harassment, harassment on any other basis, and/or retaliation, or who has witnessed or becomes aware of such conduct, must immediately report the incident directly to their supervisor, human resources representative, general manager, or Corporate Human Resources. An option for anonymous reporting is also available by using the TEGNA Hotline: 800-695-1704. This policy does not require reporting discrimination, harassment, or retaliation directly to an employee's immediate supervisor or to any individual who is creating the harassment, discrimination, or retaliation.

All reports describing conduct that is inconsistent with this policy will be investigated in an impartial, timely, and thorough manner. The rights and interests of all persons involved, including complainants, witnesses and alleged wrongdoers, will be protected during all investigations. To that end, parties involved in the situation (including the reporting party, anyone identified as the target of the behavior (if different than the reporting party) and anyone who allegedly violated this policy) will be offered an opportunity to be interviewed or to otherwise respond to a report under this policy. The Company may also interview any relevant witnesses, where necessary and appropriate. Everyone is required to cooperate as needed in an investigation. The Company may put certain interim measures in place, such as a leave of absence or a transfer, while the investigation proceeds. TEGNA will take further appropriate action once the report has been investigated. That action may be a conclusion that a violation occurred, as explained immediately below. The Company might also conclude, depending on the circumstances, either that no violation of policy occurred or that the Company cannot conclude whether or not a violation occurred.

If an investigation reveals a violation of this policy or other inappropriate conduct has occurred, then TEGNA will take corrective action, including discipline up to and including dismissal, suspension, demotion, reassignment, changes in reporting relationships, written warning, training, or other measures the Company deems appropriate under the circumstances, regardless of the job positions of the parties involved. The Company may take corrective action for any inappropriate conduct discovered in investigating reports made under this policy, regardless of whether the conduct amounts to a violation of law or even a violation of this policy. If the person who engaged in harassment is not employed by the Company, then the Company will take whatever corrective action is reasonable and appropriate under the circumstances.

The results of any official investigation will be communicated as deemed appropriate by the Company in its discretion. Anyone who intentionally provides false or inaccurate information during an investigation will be subject to discipline, up to and including an unpaid suspension or termination, and/or appropriate remedial action.

Confidentiality

To the extent possible, in investigating and in imposing any corrective action, the Company will attempt to preserve confidentiality to the extent that the needs of the situation permit.

STATE APPENDICES TO HARASSMENT POLICY

Appendix: California

This Addendum contains additions and changes to the TEGNA Employee Handbook that apply to all California employees. Except as noted below, nothing in this Addendum changes or modifies any of the policies or procedures set forth in the Employee Handbook.

Equal Employment Opportunity & Harassment

The California Department of Fair Employment & Housing (DFEH) staff is available to talk with you by telephone or in-person away from the work location. All information will be handled in an appropriate manner. Employees or job applicants who believe that they have been sexually harassed or discriminated against may file a complaint of discrimination with DFEH within three years of the alleged behavior. DFEH serves as a neutral fact-finder and attempts to help the parties voluntarily resolve disputes. If DFEH finds sufficient evidence to establish that discrimination, harassment or retaliation occurred and settlement efforts fail, the Department may file a civil complaint in state or federal court to address the causes of the discrimination and on behalf of the complaining party. DFEH may seek court orders changing the employer's policies and practices, punitive damages, and attorney's fees and costs if it prevails in litigation. Civil remedies can also include the following: fines or damages for emotional distress from each employer or person found to have violated the law; hiring or reinstatement; back pay or promotion; and changes in the policies or practices of the involved employer. Employees can also pursue the matter through a private lawsuit in civil court after a complaint has been filed with DFEH and a Right-to-Sue Notice has been issued. For more information, contact DFEH toll free at 1-800-884-1684 or website at www.dfeh.ca.gov. Retaliation for filing, pursuing, or inquiring about a claim, opposing practices prohibited by anti-discrimination and anti-harassment laws, or participating in an investigation, proceeding, or hearing related to the protocols discussed in this policy or otherwise conducted by DFEH will not be tolerated.

Appendix: Connecticut

Sexual Harassment

State provided resources can be found using the link below.

<https://www.ct.gov/chro/cwp/view.asp?a=5019&Q=609536&chroNav=%7C>

Appendix: Illinois

This Addendum contains additions and changes to the TEGNA Employee Handbook that apply to all Illinois employees. Except as noted below, nothing in this Addendum changes or modifies any of the policies or procedures set forth in the Employee Handbook.

Equal Employment Opportunity and Harassment

In addition to the protected classes described in the Employee Handbook, the Illinois Human Rights Act prohibits employment discrimination on the basis of order of protection status, their association with a person with a disability, unfavorable military discharge, arrest record (or criminal history record ordered expunged, sealed, or impounded) and conviction record (subject to applicable legal exceptions). The Company will also comply with the Illinois Genetic Information Privacy Act.

In addition to the reporting procedures outlined in the Company's general Employee Handbook, any employee who feels they have been subjected to unlawful discrimination or harassment, including sexual harassment, may also file a charge of discrimination with the Illinois Department of Human Rights within 300 days of the harassment. That charge will be investigated and, if there is substantial evidence that discrimination or harassment has occurred, a complaint will issue with the Illinois Human Rights Commission. Under certain circumstances, employees may also be permitted to file a complaint with the Illinois Human Rights Commission on their own behalf.

The Department of Human Rights can be contacted at:

State of Illinois
Department of Human Rights
State of Illinois Center
100 West Randolph, Suite 10-100
Chicago, Illinois 60601
(312) 814-6200

The Human Rights Commission can be contacted at:

State of Illinois
Human Rights Commission
State of Illinois Center
100 West Randolph, Suite 5-100
Chicago, Illinois 60601
(312) 814-6269

The Equal Employment Opportunity Commission can be contacted at:

E.E.O.C. - Chicago District
230 S Dearborn St Suite 1866
Chicago, IL 60604
(312) 872-9744

Employees who believe they have experienced sexual harassment may also contact the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.

Chicago Employees

Sexual harassment is illegal in Chicago. Sexual harassment includes sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual's employment position.

Employees in Chicago may also report discrimination and harassment, including sexual harassment, to the Chicago Commission on Human Relations ((312) 744-4111) within 365 days of the discrimination or harassment. Retaliation for reporting sexual harassment is illegal and prohibited in Chicago.

All employees working in Chicago will be required to participate in annual sexual harassment prevention training, including supervisor training, and bystander training in accordance with Chicago and Illinois law.

Appendix: Maine

This Addendum contains additions and changes to the TEGNA Employee Handbook that apply to all Maine employees. Except as noted below, nothing in this Addendum changes or modifies any of the policies or procedures set forth in the Employee Handbook.

Sexual Harassment

As the Maine Human Rights Commission notes, unwelcome sexual harassment is a form of sex discrimination that violates State law. Sexual harassment includes unwanted sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature which threatens job security, working conditions, or advancement opportunities.

In addition to the internal complaint procedures set forth in the Company's Harassment policy, if you believe you have been subjected to sexual harassment or otherwise have a concern about sexual harassment, you may file a formal complaint with the government agency set forth below. Using TEGNA's complaint process does not prohibit you from filing a complaint with these agencies. Retaliation for filing, pursuing, or inquiring about a claim will not be tolerated.

Maine Human Rights Commission (MHRC)
Office of the Commission
51 State House Station
Augusta, ME 04330.
Phone: (207) 624-6290
Fax: (207) 624-8729
Website: <https://www.maine.gov/mhrc/>
E-mail: info@mhrc.maine.gov

More information can be found at the following website:

<https://www.maine.gov/mhrc/laws-guidance/employment/sexual-harassment#regulations>

Appendix: Massachusetts

This Addendum contains additions and changes to the TEGNA Employee Handbook that apply to all Massachusetts employees. Except as noted below, nothing in this Addendum changes or modifies any of the policies or procedures set forth in the Employee Handbook.

Sexual Harassment

In addition to the internal complaint procedures in the Employee Handbook, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies set forth below. Using the Company's complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC - 300 days; MCAD - 300 days).

1. The Equal Employment Opportunity Commission ("EEOC")
John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203
(617) 565-3200
2. Massachusetts Commission Against Discrimination ("MCAD")
Boston Office: Springfield Office:
One Ashburton Place – Rm. 601 436 Dwight Street – Rm. 220
Boston, MA 02108 Springfield, MA 01103
(617) 994-6000 (413) 739-2145

Appendix: New York

This Addendum contains additions and changes to the TEGNA Employee Handbook that apply to New York. Except as noted below, nothing in this Addendum changes or modifies any of the policies or procedures set forth in the Employee Handbook.

Equal Employment Opportunity & Harassment

TEGNA does not tolerate any form of discrimination or harassment based on race, color, religion, sex (including pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), sexual orientation, gender, gender identity or gender expression, sex stereotyping (including assumptions about a person's appearance or behavior, gender roles, gender expression, or gender identity), national origin, ancestry, citizenship status, age, mental or physical disability, medical condition,

genetic information, marital status, reproductive health decision making, military or veteran status, or status in any group or class protected by applicable federal, state or local law (“Protected Characteristics”). This New York Appendix to the Company’s Harassment Policy (“NY Policy”) is one component of TEGNA’s commitment to a discrimination / harassment-free work environment. For additional information in support of this commitment please refer to our Equal Employment Opportunity policy and Harassment policy.

This NY Policy (and by internal reference, TEGNA’s Equal Employment Opportunity policy and Harassment policy) applies to all employees, applicants for employment, interns, and certain Non-Employees, as defined in Footnote 1, in New York (together, “Covered Individuals”), regardless of immigration status.¹ All must follow and uphold this policy.

Sexual harassment is a form of sex discrimination which is prohibited by federal, state, and (where applicable) local law. Sexual harassment may also be unlawful. Sexual harassment includes harassment on the basis of self-identified or perceived sex, sexual orientation, gender expression, gender identity and the status of being transgender.

Retaliation

Retaliation is prohibited by TEGNA. Retaliation is any adverse action that could discourage an individual from coming forward to report or support a discrimination or harassment complaint, or that may occur as a result of any “protected activity” as defined below. Adverse action need not be job-related or occur in the workplace to constitute retaliation.

Federal, state and (where applicable) local laws protect any Covered Individual who has engaged in “protected activity.” Protected activity occurs when a person has, in good faith: (i) made a complaint of discrimination, or harassment, either internally or with any anti-discrimination agency; (ii) testified or assisted in a proceeding involving federal, state, or local anti-discrimination law; (iii) opposed discrimination or harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of discrimination or harassment; (iv) reported that another individual has been discriminated against or harassed; or (v) encouraged an individual to report discrimination or harassment. Making intentionally false claims of discrimination, harassment or retaliation is not protected activity.

¹ A Non-Employee is someone who is (or is employed by) a contractor, subcontractor, vendor, consultant, or anyone providing services in the workplace. Protected Non-Employees include persons commonly referred to as independent contractors, “gig” workers and temporary agency workers. Also included are persons providing equipment repair, cleaning services or any other services provided pursuant to a contract with TEGNA. Nothing herein is intended to create an employment relationship between TEGNA and contractors, subcontractors, vendors, consultants, independent contractors or temporary agency workers.

Complaints

Covered Individuals may make internal complaints of discrimination, harassment, or retaliation to the Company pursuant to the Complaint Procedure in the Company's Harassment policy. In New York, Covered Individuals may also make a complaint in writing by utilizing the Complaint Form, which is attached to this NY Policy, and everyone is encouraged to use this Complaint Form to report potential discrimination, harassment and/or retaliation.

External Legal Protections And Remedies

Discrimination, harassment and retaliation are not only prohibited by the Company but also are prohibited by state, federal, and, where applicable, local law, and may also be unlawful.

It is TEGNA's desire to resolve all complaints of discrimination, harassment and/or retaliation through its internal complaint resolution process described above. However, the Company also recognizes an individual's right to seek assistance from outside agencies. Aside from the internal process at TEGNA, those who believe they may have been discriminated, harassed and/or retaliated against may choose to contact the following governmental entities.

The Company is subject to the New York Executive Law, administered by the New York State Division of Human Rights ("SDHR"), Title VII of the Civil Rights Act, administered by the U.S. Equal Employment Opportunity Commission ("EEOC"), and the New York City Human Rights Law, administered by the New York City Commission on Human Rights ("CCHR"). These agencies take complaints of discrimination, harassment, and retaliation and investigate to make determinations on the merits. Administrative and judicial review of agency determinations is provided for by the laws in question. You also have the right to file a complaint in a court of law. You can locate the nearest regional SDHR office by calling (718) 741-8400 or on the website at <https://dhr.ny.gov>. The EEOC is at 33 Whitehall Street, 5th Floor, New York, New York 10004 or you can call (800) 669-4000, (TTY: 1-800-669-6820). Information about the CCHR is located at: www.nyc.gov/html/cchr/html/home/home.shtml or by calling 311. Many localities enforce laws protecting individuals from discrimination, harassment, or retaliation. Contact your county, city or town to see if such a law exists.

If there is a finding that the law was violated, remedies may include termination of unlawful acts, monetary damages, including back pay and benefits, attorney's fees and costs, civil fines, equitable relief and possible liquidated damages. The law governing discrimination based on reproductive health decision making also provides for additional relief, including: injunctive relief and reinstatement.

TEGNA

New York Discrimination/Harassment/Retaliation Complaint Form

If you believe that you have been the victim of any form of discrimination, harassment or retaliation, or have witnessed such conduct, you are encouraged to use this form to report such conduct or report it verbally to TEGNA's Human Resources immediately.

Your Name & Title: _____

Your Phone Number and Email Address: _____

Your Immediate Supervisor/Manager: _____

Date Offending Conduct First Occurred: _____

Date Offending Conduct Last Occurred: _____

Harassment/Discrimination: If you believe that you have been subjected to, witnessed, or have knowledge of harassment or discrimination, describe the discriminatory or harassing conduct or actions (if you need more space, please continue on a separate piece of paper):

Retaliation: If you believe that you or another Covered Individual were treated differently after reporting or helping someone report discriminatory behavior or harassment, participating as a witness in an investigation or other judicial or administrative action, or opposing discriminatory behavior or harassment, check the box below, state how you or another Covered Individual opposed the discrimination or harassment, and explain the retaliatory conduct:

I believe that I and/or another employee was retaliated against:

Alleged Wrongdoer: Identify the person or people who discriminated, harassed and/or retaliated against you or another (if you need more space, use a separate piece of paper):

Name: _____ Title: _____

Name: _____ Title: _____

Witnesses: List all witnesses to the discriminatory, harassing or retaliatory conduct (if you need more space, please list them on a separate piece of paper):

Name: _____ Title: _____

Name: _____ Title: _____

Documents: If there are any documents or additional information that you believe are relevant to your complaint, please attach them.

Appendix: Oregon

This Addendum contains additions and changes to the TEGNA Employee Handbook that apply to all Oregon employees. Except as noted below, nothing in this Addendum changes or modifies any of the policies or procedures set forth in the Employee Handbook.

Equal Employment Opportunity & Harassment

This policy supplements the Equal Employment Opportunity policy and Harassment policy set forth in the Employee Handbook in compliance with Oregon law.

The Company's Equal Employment Opportunity and Harassment policies also prohibits discrimination and harassment based on a person's expunged juvenile record and specifically prohibits sexual assault.

In addition to the reporting procedure set forth in the Employee Handbook's Harassment policy, the Company and employees should also document any incidents involving conduct prohibited by this policy.

Employees have five years to file a claim for any occurrence of an unlawful employment practice under ORS 659A.030, ORS 659A.082, or 659A.112 (which include discrimination on the basis of most protected classes) that occurs on or after September 29, 2019.

The Company may not require or coerce an employee to enter into a nondisclosure or non-disparagement agreement involving conduct that is prohibited by the policy. Under this policy, a nondisclosure agreement is any agreement by which one or more parties agree not to discuss or disclose information regarding any complaint of work-related harassment, discrimination, or sexual assault. A non-disparagement agreement is any agreement by which one or more parties agree not to discredit or make negative or disparaging written or oral statements about any other party or the company. However, if an employee believes they have been subject to conduct prohibited by this policy they may voluntarily request to enter into such an agreement, as described above, and will also have at least seven days to revoke any such agreement.

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