

# Anti-Harassment Policy

---

## Eligibility:

All regular Monsanto full-time, part-time U.S. employees and contractors.

## Purpose:

To make clear that harassment will not be tolerated in Monsanto and to set forth the procedure for filing harassment complaints.

## Policy:

Monsanto remains committed to the premise that all individuals have a right to function in a working environment that is safe, productive, respectful, and free from discrimination. In keeping with this commitment, harassment, based on legally protected characteristics, will not be tolerated. Special attention should be paid to the prohibition of sexual harassment.

Under this policy, Monsanto prohibits harassment by an employee against another employee, by an employee against a non-employee, and by a non-employee against an employee. Retaliation against an employee who has filed a harassment complaint or participates as a witness in the investigation of such a complaint is prohibited. Monsanto also prohibits frivolous and malicious harassment complaints.

### 1. Definition of Harassment:

“Harassment”, based on legally protected characteristics, is a form of illegal discrimination. It generally occurs when words or actions, which are of a severe or pervasive nature, create an intimidating, hostile or offensive working environment.

Monsanto prohibits harassment on the basis of the race, color, religion, sex, age, national origin, status as a protected veteran or individual with disability, gender identity, gender expression, sexual orientation (real or perceived, as manifested by identity, acts, statements or associations), or any other characteristic protected by applicable federal or state law. And further, in accordance with the Equal Employment Opportunity Commission (EEOC) guidelines, Monsanto prohibits harassment on the basis of any legally protected characteristic of an employee’s relatives, friends, or associates.

### 2. Definition of Sexual Harassment:

The EEOC has issued guidelines, which define sexual harassment as:

“Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when such conduct is made either explicitly or implicitly a term or condition of an individual’s employment; or,

“(When) rejection of such conduct by an individual is used as the basis for employment decisions affecting such an individual; or

“(When) such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment.”

Some examples of conduct which may constitute hostile work environment sexual harassment include: leering; sexual gestures; displaying sexually suggestive objects or pictures, cartoons, calendars, magazines or posters; whistling and cat calls; making derogatory or sexual comments, epithets or jokes; unwelcome physical contact; threatening conduct, including assault or blocking someone's movement; repeated and unwelcome comments about someone's physical appearance; and a bad temper with only one gender, even if there are no overtly sex-based remarks.

All forms of sexual harassment involve "unwelcome conduct" meaning, conduct that was not solicited or incited by the victim. This includes words or actions between people of different genders or of the same gender.

## Complaint Procedure:

1. An individual who believes that he or she has been harassed or has witnessed harassment occurring must bring this to the attention of his or her immediate supervisor or next level or his or her Human Resources representative. In the alternative, the individual may consult the site/unit/EEO Coordinator or the Affirmative Action/EEO Director at 1-888-897-5314.
2. An individual who brings such a complaint to the attention of Monsanto, in good faith, will have it promptly investigated in an impartial manner on a need-to-know basis.
3. When a harassment complaint is substantiated, immediate and appropriate remedial action will be taken, up to and including job termination.
4. Monsanto strongly believes in internal resolution of harassment complaints, but recognizes that an individual has the right to file a charge with the appropriate state or federal agency.

## Employees Responsibilities:

Employees are expected to adhere to this policy and respect the rights of others. Employees who observe or are made aware of sexual or other unlawful harassment in the workplace are obligated to report the incident.

## Manager's Responsibilities:

Each management employee has the responsibility to keep the workplace free of any form of harassment, and in particular sexual harassment. All management employees are required to enforce this policy and to create an atmosphere free of sexual discrimination and unlawful harassment.

## Monsanto's Responsibilities:

Any employee, supervisor or manager who is found to have violated this harassment policy will be subject to appropriate disciplinary action up to and including termination. Monsanto prohibits any form of retaliation against employees for bringing up bona fide complaints or providing information about harassment.