

## **Gender Identity and Workplace Inclusion Guide**

EAB is committed to maintaining an environment free from any form of discrimination, harassment, or retaliation, and all employees must adhere to these policies. Gender identity (a person's innate, internal sense of their gender) and gender expression (the way in which a person presents their gender to the outside world) are protected characteristics as described in the Equal Employment Opportunity and the Discrimination, Harassment & Retaliation Prevention Policies.

Please refer to the Definitions section at the end of this policy for additional information and context. If you would like to have a conversation regarding this guide or about transgender-related topics, please contact your Talent Business Partner.

### **Guide**

This guide is designed to create a safe and productive workplace environment for all employees. This guide sets forth guidelines to address the needs of transgender and gender non-conforming employees and to protect the safety of such employees. This guide addresses many situations that might occur with respect to transgender or gender non-conforming employees, and the needs of each transgender or gender non-conforming employee must be assessed on a case-by-case basis. In all cases, the goal is to ensure the safety, comfort, and healthy development of transgender or gender non-conforming employees while maximizing the employee's workplace integration and minimizing stigmatization of the employee.

### **Privacy**

Transgender employees have the right to discuss their gender identity or gender expression openly, or to keep that information private. EAB supports the employee's right to decide when, with whom, and how much information to share. Information about an employee's transgender status (such as the sex they were assigned at birth) can constitute confidential medical information under privacy laws like HIPAA.

### **Official Records**

EAB will change an employee's official record to reflect a change in preferred name or gender upon request from the employee. However, certain types of records, like those relating to payroll, medical, and retirement accounts, may require specific documentation showing a legal name change before the person's name can be changed. If a new or transitioning employee has questions about company records or ID documents, the employee should contact the Benefits team ([benefits@eab.com](mailto:benefits@eab.com)).

### **Names/Pronouns/Photographs**

An employee can change their preferred name and pronoun in Dayforce. If you are unsure what pronoun a colleague might prefer, you can ask the colleague how they would like to be addressed. EAB will not tolerate employees' intentional or persistent refusal to respect a colleague's gender identity (for example, intentionally referring to the employee by a name or pronoun that does not correspond to the employee's gender identity). Such harassment is a violation of our Discrimination, Harassment, and Retaliation Policy. While we understand that there may be an occasional mistake in the early stages of a transition, it is our expectation that all staff will honor the employee's preferred name and pronoun.

At the first opportunity and the employee's request, EAB will replace all photographs of a transitioning employee on display in the workplace with an updated photo portraying the individual in his/her/their/hir new gender.

## **Transitioning on the Job**

Employees who transition on the job have the full support of EAB's leadership and the Talent department. When making a workplace transition, the first step you should take is to inform key personnel who can assist you. The Benefits team and your Talent Business Partner will work with transitioning employees individually to develop a workplace transition plan that supports your informing your manager and colleagues.

## **Transitioning Individual**

If you are transitioning on the job, you have the right to openly be who you are. This means that you may express your gender identity, characteristics, or expression without fear of consequences. With this right comes the expectation that you will work with others to ensure that they understand your needs.

We must be aware of your situation in order to provide support. When you reach out to the Talent team, be sure to express your intentions, needs, and concerns. When you decide to inform your manager, your colleagues, or others, remember that they may not be educated about such issues and may not understand clearly your specific needs. Leverage your resources within the Talent team to help you facilitate those discussions.

## **Managers and Colleagues of Transitioning Individual**

If someone who reports to you informs you that they are currently transitioning or planning to transition, EAB expects managers and employees to demonstrate respect. Below are some guidelines to reflect your support:

- Listen carefully to what the individual is telling you about how they would like to be treated and how they wish to be addressed in the workplace.
- Make it clear to the transitioning individual that your conversation will be held in confidence, to the extent possible and in accordance with applicable law.
- Reach out to your Talent Business Partner for resources available to you.

During the early stages of an individual's transition, few, if any actions will be required on your part. Issues related to changes in the employee's physical appearance and name, as well as usage of restroom facilities and locker rooms, will be addressed via the workplace transition plan.

## **Workplace Transition Plan**

The Talent team and the transitioning employee will develop a workplace transition plan for transitioning in the workplace that includes some or all of the following elements:

- Develop a strategy on how to inform your manager, co-workers, external Partners, if applicable, and others about your transition.
- If needed, develop a support team that may include your Talent Business Partner, your manager, and/or other supportive co-workers.
- Create a timeline of target transition dates and milestones, such as a legal name change.
- Consider all of the steps that a new employee must take during the first weeks of employment, such as getting a security badge photo, filling out W4 forms, and completing insurance paperwork, and develop a plan to accomplish those tasks.

## **Trans Inclusive Restroom/Facilities**

EAB's policy is that employees, guests, and partners should use the facilities that correspond with their gender identity, regardless of their sex assigned at birth. For example, a person who identifies as a man should use the men's restroom, and a person who identifies as a woman should use the women's restroom. Additionally, a single-occupancy,

all-gender restroom is available in both the D.C. and Richmond offices. Any employee, guest, or partner may choose to use the all-gender restroom, but no one, including a transgender person, is required to. All employees, guests, and partners should determine the most appropriate and comfortable options for themselves.

### **Appearance Standards**

EAB has the right to regulate employee appearance and behavior in the workplace for reasonable business purposes as outlined in the Dress Code & Appearance policy. A transgender or gender non-conforming employee is permitted to dress consistently with their gender identity and is required to comply with the same standards of dress and appearance as apply to all other staff in their workplace and similar position.

### **Definitions**

The definitions provided here are not intended to label employees but rather to assist all employees in understanding this Policy. Employees may or may not use these terms to describe themselves.

- **Sex:** The biologically based presumption of reproductive capability to determine a person's label of female or male. This label, at birth, is usually based on a doctor's visual assessment of a baby's genitalia.
- **Gender:** The social meaning given to sex. A person's gender role reflects the duties, qualities, and expectations of society based on gender, which include how we have learned to walk, look, talk, and act; the first name we were given, and so on.
- **Gender identity:** A person's internal, deeply felt sense of being male, female, or a blend of both or something other, regardless of the sex they were assigned at birth. Everyone has a gender identity and gender identity is distinct from sexual orientation.
- **Gender expression:** An individual's external characteristics and behaviors (such as appearance, dress, mannerisms, speech patterns, and social interactions), that may be perceived as masculine or feminine or something more gender fluid. Gender expression is distinct from sexual orientation.
- **Cisgender:** Cisgender refers to individuals whose sex assigned at birth corresponds to their gender identity and expression.
- **Transgender:**
  - An umbrella term for people whose gender identity and/or expression is different from cultural expectations based on the sex they were assigned at birth. Being transgender does not imply any specific sexual orientation. Therefore, transgender people may identify as straight, gay, lesbian, bisexual, queer, etc.
  - A person whose sex assigned at birth was female but who identifies as male is a transgender man.
  - A person whose sex assigned at birth was male but who identifies as female is a transgender woman.
  - Some people described by this definition do not consider themselves transgender – they may use other words or may identify simply as a man or woman or as gender non-binary.
- **Gender non-conforming:** This term describes people who have, or are perceived to have, gender characteristics and/or behaviors that do not conform to traditional or societal expectations associated with that gender. Keep in mind that these expectations can vary across cultures and have changed over time.
- **Transition:** The process of aligning one's gender expression with one's gender identity. There are many different ways to transition. The process of transitioning can be extensive and may require psychological testing, monitoring and counseling, hormone therapy, and a trial period, or "real-life experience," of at least one year

living as one's identified gender to determine the level of comfort that the individual has in a gender different from their assigned sex at birth. Each person's transition is highly personal and unique. Transition may include but is not limited to: "coming out" (telling family, friends, and coworkers); changing the name and/or sex on legal documents; and, for many transgender people, accessing medical treatment, such as hormones and gender-affirming surgery.

- **Sexual orientation:** A person's physical or emotional attraction to people of the same and/or different gender. The words "straight," "gay," and "bisexual" are some ways to describe sexual orientation. It is important to note that sexual orientation is distinct from gender identity and expression. Transgender, cisgender, and gender non-conforming people can be gay, lesbian, bisexual, or straight.