US CONDUCT IN THE WORKPLACE AND ANTI-HARASSMENT POLICY

PURPOSE

This policy confirms Elanco's commitment, consistent with its promise to foster an inclusive culture, to maintain a workplace free of improper conduct and harassment.

POLICY

Conduct in the Workplace

Employees must act with courtesy, respect, and consideration when interacting with applicants, employees, business colleagues, and customers, even when engaging in work activities outside of the workplace or regular business hours.

Prohibition of Harassment

Elanco is committed to providing a workplace free from unlawful harassment, sexual or otherwise. Harassment is defined as unwelcome physical or verbal behavior or written material showing hostility toward an individual because of the individual's – or the individual's relative's, friend's, or associate's – age, ancestry, citizenship, color, disability, gender, gender expression, gender identity, genetic information, marital status, medical condition, national origin, pregnancy, race, religion, sex, sexual orientation, veteran and uniformed military status, or any other legally protected status or characteristic when it:

- creates or is intended to create a hostile, intimidating, or offensive work environment,
- interferes or is intended to interfere with an individual's work performance, or
- adversely affects an individual's employment opportunities with the Company.

Examples of harassing conduct may include epithets, slurs, negative stereotyping, threats, intimidation, hostility toward an individual or group, and written or graphic material that shows inappropriate humor that is visible on walls, bulletin boards, or elsewhere in the workplace.

Harassing conduct does not have to occur during working or business hours; it can occur outside of working hours (including during personal time). Similarly, harassing conduct does not have to occur on Company property. The workplace may extend beyond the physical boundaries of Elanco and its owned or leased facilities, campuses, and worksites. This includes but is not limited to Elanco-owned or leased vehicles; home offices environments; electronic environments; restaurants, hotels, meeting facilities, and other sites used for Elanco business purposes, including business social

events; and personal social media accounts that can be directly or indirectly associated with your Elanco employment.

Elanco specifically prohibits and will not tolerate any sexual harassment. Sexual harassment occurs when unwelcome physical or verbal behavior or written material of a sexual nature:

- becomes a condition of an employee's continued employment;
- affects other employment decisions regarding the employee; or
- creates or is intended to create a hostile, intimidating, or offensive work environment.

Examples of sexual harassment may include:

- requests or demands for sexual favors or social encounters;
- unwanted physical contact such as touching, patting, pinching, or brushing the body;
- verbal harassment such as sexual innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, or sexual threats;
- nonverbal conduct such as display of sexually suggestive objects or pictures from the internet or elsewhere, leering, whistling, indecent exposure, or sexually suggestive gestures; and
- acts of physical aggression, intimidation, hostility, threats, or unequal treatment based on an individual's gender, even if not sexual in nature.

To best ensure that Elanco delivers on its promise to employees to foster an inclusive environment, Elanco prohibits any inappropriate conduct based on any legally protected characteristic, whether or not the inappropriate conduct rises to the level of harassment. Elanco employees are required to complete anti-harassment training on an annual basis, or as otherwise required by local law.

Elanco encourages employees who experience or learn of conduct that may violate this policy to report it to a member of Elanco management, Human Resources or the IntegrityLine. Managers must report potential violations of this policy and concerns relayed to them by subordinate employees to Human Resources or the IntegrityLine. A manager's failure to report a suspected policy violation may result in discipline, up to and including termination of employment, depending on the seriousness of the violation. Elanco's IntegrityLine is a convenient, confidential and, at the employee's option, anonymous way to report concerns. Employees can report concerns to the IntegrityLine via phone at 866.921.6714, or on the Spot (intranet site), seven days a week, 24 hours a day, from any phone or computer, anywhere in the world.

RELATED POLICIES AND RESOURCES

Code of Conduct

Speak Up: No Retaliation

Anti-Harassment/Sexual Harassment Training Information for NY State and City

Origination	03/11/2019	Owner	Employee Relations
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