SOCIAL CONDUCT POLICY

Wiley strives to maintain a workplace culture based on mutual respect among colleagues. Together we have the shared responsibility for ensuring that our company is a place where people feel safe, supported, and valued, while protecting our company from conduct that can threaten our day-to-day operations, our reputation, and our future growth. This policy addresses Wiley’s workplace culture and how to recognize and respond when a colleague believes they have been harassed, discriminated against, or bullied.

Whom to contact:

If you have questions about this policy, contact your local HR representative. For operational questions, contact Legal.
# Social Conduct Policy

## Policy

### Social Conduct Policy

## Scope

This policy applies to all employees of John Wiley & Sons, Inc. and its subsidiary and affiliated companies (throughout this policy we will refer to these entities collectively as “Wiley”).

## Introduction

Respect and civility among colleagues are the cornerstone of Wiley's workplace culture. This culture allows colleagues to bring their best selves to work.

To emphasize Wiley's commitment to our workplace culture, Wiley has created this global Social Conduct Policy (referred to as the “Policy”). We hope and expect that it will increase an open dialogue around good workplace conduct.

All employees of Wiley (we will refer to employees as “colleagues”) are expected to have reviewed this Policy, to be familiar with its contents, and to conduct themselves consistently with the principles expressed. Failure to do so may result in disciplinary action. Wiley may amend, supplement, or rescind any portion of the Policy as Wiley deems appropriate. Within this Policy are references and/or links to additional policies, including local social conduct policies. As with this Policy, colleagues are expected to read and be familiar with applicable local policies and work rules.

This Policy is designed to inform and guide colleagues' conduct toward one another and to encourage communication among colleagues, managers, and Human Resources. This Policy does not establish or amend a contractual relationship between Wiley and its employees. Similarly, this policy does not alter a colleague's employment status (e.g., “at will” or pursuant to a contract).

## Equal Employment Opportunity

Wiley provides equal employment opportunities to all colleagues and applicants for employment regardless of age, ancestry, color, religious creed, physical or mental disability (including HIV and AIDS), marital status, medical condition, genetic information, military and veteran status, national origin, race, sex, gender, gender identity, gender expression, sexual orientation, or any other status protected by law.

This Policy extends to all terms, conditions, and privileges of employment and covers all actions relating to applying for and advancing in employment, including selection, recruitment, assessment, promotion, training, transfer, compensation, layoff, and termination. It is based on our goal of fully developing and utilizing all human resources. Supervisors, colleagues, and third parties are prohibited from engaging in unlawful behavior with respect to protected classes.

Colleagues who believe they have been subject to discrimination, harassment, or retaliation should follow the procedures set forth in the Complaint Procedures section of this Policy. The procedures include notifying a manager or Human Resources, or calling the Business & Social Conduct Hotline. Wiley will investigate all complaints fairly, promptly, and thoroughly. Wiley will not retaliate or tolerate retaliation against any person who has made a good-faith complaint or has cooperated with an investigation into a complaint.

Colleagues deemed by Wiley to have engaged in discrimination, harassment, or retaliation against another colleague will be subject to appropriate disciplinary action up to and including termination of employment.

## Wiley Prohibits Harassment, Discrimination, and Bullying

Wiley expects that colleagues will treat each other with respect and civility. Wiley's goal is to foster a safe and professional environment that is free from harassment, discrimination, bullying, violence and other offensive and prohibited conduct.

### No Discrimination or Harassment: Wiley policy prohibits various types of discrimination and harassment that are against the law. Discrimination or harassment that is contrary to law is based on a colleague's protected class, which includes race, color, ethnicity or national origin, religion, age, disability (mental or physical), sex, gender, pregnancy, sexual orientation, gender identity, marital status, military and veteran status, medical condition, and any additional classes set forth in any law or regulation. This type of conduct is unacceptable to Wiley and Wiley will not tolerate any discriminatory, harassing or violent behavior by employees, customers, or contractors against an employee or customer. In some instances, Wiley's standards and expectations are
broader than what is required by law, which means that conduct which may not rise to the legal definition of harassment would still violate Wiley policy.

Harassment can come in many forms. Harassment includes unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive, or hostile work environment. Wiley considers the following non-exhaustive list to be unacceptable behavior:

- Sexual harassment, which includes unwanted sexual advances or requests for sexual favors
- Displaying sexually explicit photographs or other materials
- Basing employment decisions on the submission to or rejection of harassing conduct
- Basing employment decisions on age, race, gender, disability, or other protected characteristics
- Offensive language or jokes
- Racial, ethnic, gender, or religious teasing or slurs
- Mocking someone due to a disability
- Degrading comments
- Intimidating or threatening behavior
- Showing hostility towards others, including when the hostility is based on a person’s protected characteristics
- Staring or leering
- Excluding a colleague from an event due to race, age, gender, disability, or other protected characteristics.

Please do not act in a harassing or discriminatory manner or otherwise cause your co-workers to feel uncomfortable in their work environment. Please remember that harassment, sexual or otherwise, and discrimination are determined by your actions and how they impact others, regardless of your intentions.

In addition to co-workers, employees are prohibited from harassing or discriminating against customers, contractors, visitors, and any others with whom they interact as part of their employment at Wiley. Wiley encourages colleagues to report any harassing or discriminatory behavior from consultants or other third parties when the behavior affects you as part of your employment at Wiley. Wiley will address actions taken by any individual not employed by Wiley who is alleged to have harassed or discriminated against a colleague. Conduct determined to be inappropriate but not rising to the level of the legal definition of harassment or discrimination will also be addressed.

**Sexual Harassment**: Wiley prohibits all forms of unlawful sexual harassment in the workplace. Sexual harassment is broadly defined, the following are non-exhaustive examples of sexual harassment:

- An unwelcome sexual advance, an unwelcome request for sexual favors, or any other unwelcome conduct of a sexual nature, which make the claimant feel offended, humiliated or intimidated, and/or that is made to another person in circumstances in which a reasonable person, having regard to all the circumstances, should have anticipated that the other person would be offended, humiliated or intimidated; or
- Conduct of a sexual nature that results in the creation of a sexually hostile or intimidating work environment for the claimant.

The following are examples of the types of prohibited conduct of a sexual or discriminatory nature:

- **Verbal harassment** – examples: name calling, belittling, sexually explicit or degrading words to describe an individual, jokes, verbal abuse or graphic verbal commentaries about the body.
- **Physical harassment** – examples: touching, pushing, pinching, patting, grabbing, brushing against or poking another person’s body or requiring or suggesting that a team member wear sexually suggestive clothing.
• Visual harassment – discriminatory or sexually oriented pictures, writing or objects; displaying or permitting the display of sexually explicit materials on the Internet or the Buddy Intranet; sexually oriented gestures or unwanted love letters or notes.

• Sexual favors – continued requests for dates; promises of advancement or additional wages in exchange for sexual favors; any threat of demotion, termination or so forth if requested sexual favours are not given.

It is impossible to define every action or all words that could be reasonably interpreted as Sexual Harassment or discrimination. The examples listed above are not meant to be a complete list of prohibited behaviour, nor do they always constitute sexual harassment or discrimination. Although it depends upon the circumstances, sexual harassment generally involves behaviour that is uninvited, unwelcome and repeated.

No Bullying: Wiley aims to provide a working environment free from bullying and ensure all colleagues are treated, and treat others, with dignity and respect. Wiley policy prohibits bullying behavior.

Bullying is repeated, offensive, intimidating, malicious or insulting behavior by a colleague or group of colleagues, directed towards another colleague or group of workers, that creates a risk to physical and/or psychological health and to safety. Bullying can be physical, verbal, or written. It can include words or statements that are transmitted in person, by mail, phone, fax, email, and through social media. A single incident of unreasonable behavior is not considered to be workplace bullying. However, it may have the potential to escalate and should not be ignored.

Bullying should not be confused with advice or counselling on work performance or work-related behavior where an individual or group is provided with constructive criticism due to demonstrated performance deficiencies.

Examples of bullying at work may include but are not limited to the following:

• Verbal abuse including screaming, yelling, or abusive or threatening language

• Singing someone out to be the brunt of practical jokes

• Creating or spreading rumors or gossip concerning a colleague's personal life, physical characteristics, health, protected status, or other discussions of an intimate nature (please note that this does not apply to conversations around wages, hours, or working conditions).

• Deliberately withholding information that is vital for effective work performance in order to undermine the individual or their performance

• Derogatory or intimidating behavior

• Psychological harassment or intimidation

• Offensive physical contact or acts, or physical violence against another person

• Cyberbullying (i.e., bullying that takes place through a smart phone, computer, or tablet, and often happens through social media)

If you believe that you have been harassed, bullied, or discriminated against, or that you have witnessed harassment, bullying, or discrimination, we urge you to report the incident to your manager or Human Resources, or through the Business & Social Conduct Hotline, as set forth in the Complaint Procedures section below.

When complaints are found to have merit, the offender will be subject to disciplinary action, at Wiley's discretion, up to and including termination of employment.

COMPLAINT PROCEDURES

If you believe that you have been subjected to or witnessed harassment, discrimination, or bullying, we urge you to report the incident.

Incidents may be reported:

• To your manager

• To Human Resources
- Through the [Business and Social Conduct Hotline](#) (which may be made anonymously).

If you are a manager, you must report the incident to Human Resources. Staff in supervisory or management positions must ensure that they are responsive, acting immediately, if they become aware of any harassment taking place.

Once you have reported an incident, Human Resources and other relevant departments will conduct an impartial investigation into the incident. The investigation is likely to include speaking with witnesses to the incident as well as with the accused. Employees have an obligation to cooperate fully and to share information openly and honestly in any Wiley investigation. Unless you choose to remain anonymous (i.e., if you call the Business & Social Conduct Hotline and choose to remain anonymous), Wiley will keep you informed of the investigation’s progress. Complaints will be kept confidential to the fullest extent possible.

Depending upon the circumstances of the allegation, Wiley may suspend with or without pay any alleged offender, pending a complete investigation. Once an investigation is completed, if the complaint is found to have merit, the offender will be subject to discipline, up to and including termination of employment.

### Retaliation

In the event that you report an incident, please be assured that Wiley will not tolerate retaliation against you or any colleague who has made a good-faith complaint, or who has cooperated with an investigation into a complaint. A colleague who believes they have been retaliated against should immediately report the retaliation, using one of the avenues outlined above.

### Local Policies

Wiley has offices in 36 countries. National and local laws differ among countries and may differ from this Policy. Please review your local policy or policies.