



BATH & BODY WORKS SEXUAL HARASSMENT PREVENTION POLICY

INTRODUCTION

Bath & Body Works (the “Company”) believes that everyone deserves a place where they feel safe, respected and valued for who they are, as they are. Inappropriate workplace behavior and unlawful harassment create conditions inconsistent with this commitment and our values.

The purpose of this Sexual Harassment Prevention Policy (the “Policy”) is to create and maintain a work environment that is free from all forms of sexual harassment, whether that harassment is because of self-identified or perceived sex (including pregnancy, childbirth, breast feeding/lactation, or medical condition related to the same), sexual orientation (including heterosexuality, homosexuality, and bisexuality), gender identity (meaning a person's internal understanding of their gender, or perception of a person's gender identity, which may include male, female, a combination of male and female, neither male or female, a gender different from the person's sex assigned at birth, or transgender) or gender expression.

This Policy applies to all associates, others not traditionally defined as associates, such as applicants for employment, interns and externs (whether paid or unpaid), trainees, independent contractors, subcontractors, temporary workers, and consultants, regardless of immigration status. This policy also applies to all customers, vendors, contractors, business partners or potential business partners and other third parties when they are doing business with us or are on our premises, and we expect and require that they will be treated with respect and that they will behave in ways that align with our culture of respect.

Violation of this Sexual Harassment Prevention Policy will result in disciplinary action, including potentially termination of employment.

SEXUAL HARASSMENT DEFINED

Sexual harassment is an unlawful form of workplace discrimination that may subject the Company and individual associates to legal liability. More importantly, sexual harassment is against our policies and values. Harassment creates lasting injury to the people who experience and witness it, undermines morale and productivity generally, and damages the Company's culture, reputation, and image. It destroys the culture of equal respect, civility, and inclusiveness that we seek to maintain.

“Sexual harassment,” which refers to all unwanted sexual and sex-based conduct, includes 5 key categories of misconduct:

1. Unwanted sexual advances, attention or repeated comments;
2. Sexual coercion, which means unwanted sexual attention backed up by job-related threats or bribes;
3. Sex-based harassment, which refers to any unwanted conduct directed at an individual because of that person's sex. Sex is defined to include sexual orientation, self-identified or perceived sex, gender identity, gender expression, or transgender status;
4. Harassment based on sex stereotyping, which occurs when an individual's conduct, personality traits or demeanor are considered inappropriate simply because they do not conform to other people's ideas about how individuals of a particular sex should look or behave. Sex stereotyping also occurs when harassing conduct is based on assumptions about an individual's family responsibilities, such as an assumption that women are primary caregivers and fathers should take parental leave; and
5. Harassment based on an individual's pregnancy, childbirth, or related medical conditions, including lactation.

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Sexual harassment may also create a hostile work environment when:

- submission to such conduct is either explicitly or implicitly made a term or condition of an individual's employment; or
- submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual; or
- such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

Below is a non-exhaustive list of examples of what may constitute sexual harassment or a hostile work environment.

1. Threatening to take or taking employment action(s) against a person, such as discharge, demotion or reassignment, if sexual favors are not granted.
 - **Example:** Bob tells a subordinate that if she refuses to have sex with him, he will terminate her employment.
2. Demands for sexual favors or submission to sex-based attention in exchange for favorable or preferential treatment.
3. Unwelcome and repeated flirtations, propositions, sexual advances, or comments of a sexual nature.
 - **Example:** Janet routinely compliments an associate on their physical appearance, telling them they are attractive. These compliments make the associate uncomfortable, but Janet continues to make the compliments even after the associate asks her to stop.
4. Unwelcome physical contact or horseplay.
 - **Example:** Mark massages an associate's shoulders every time he passes her desk, and often touches her arm when they are speaking.
 - **Example:** When Debbie completed a large sale, Joan slapped Debbie on the backside and said, "Atta girl!" Although Debbie told Joan she did not like to joke around this way, Joan said, "Lighten up," and slapped Debbie's backside again the next time Debbie completed a sale.
5. Whistling or improper gestures.
6. Use of stereotypes or harassment based on sex stereotyping.
 - **Example:** David wore eye makeup and earrings to work. When he arrived, Sally stared at him, and asked why he was wearing make-up. When David said he felt like dressing up that day, Sally told him he looked strange, and that men should not wear make-up.
7. Offensive, insulting, derogatory or degrading remarks.
8. Unwelcome comments about appearance.
 - **Example:** When Barbara wore a pantsuit to work, Matt joked that her outfit was not particularly flattering and that a skirt would show off her figure better.

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9. Sexual jokes or use of sexually explicit or offensive language.
10. Gender or sex-based pranks.
11. Display in the workplace of sexually suggestive objects or pictures.
12. Harassment based on an individual's pregnancy or childbirth status, or related medical conditions, including lactation.

Sexual harassment need not be severe or pervasive to violate our policy; it can be any harassing conduct that consists of more than petty slights or trivial inconveniences. Moreover, even conduct that may seem harmless in isolation can amount to a hostile work environment when aggregated over time.

Sexual harassment does not have to be explicitly sexual in motivation or content nor gendered in content to be a violation of Company policy. It also need not consist of sexual advances or derogatory sexual commentary, or comments that certain genders do not belong on the job. Sexual harassment can also include bullying, belittling, yelling, shoving, physical assault, sabotage, ostracism, undermining, and any other unwanted conduct that is directed at an individual because of that person's sex.

Sexual harassment can occur between people of any sex or gender; between same-level associates; or different-level associates; or between associates and vendors; or associates and customers. It can be directed from a higher-level associate (such as a manager or supervisor) to a lower-level associate, but also from a lower-level associate toward a higher-level associate, for example, if a male associate resents having to work for a female supervisor and engages in harassing conduct that undermines her authority and performance. Customers can also direct harassing conduct at associates, and vice versa.

Our prohibition against harassment also applies to informal business situations and Company-sponsored events, including Company parties and business trips.

Because it is difficult to define all unlawful harassment, associates are expected to behave at all times in an appropriate manner consistent with the intended purpose of this Policy.

REPORTING HARASSMENT

If we are unaware that harassment or inappropriate workplace behavior has occurred, we cannot take the appropriate steps to correct it. Accordingly, we strongly encourage the prompt reporting of all incidents of harassment or inappropriate workplace behavior. If you are an associate, customer, vendor, contractor, or other business partner and believe you are being harassed or are subject to inappropriate workplace behavior, or have observed either, please make a report.

Any manager or supervisor, even if temporarily serving in the role, who believes they've observed retaliatory conduct must report the conduct. Please [click here](#) to access the Company's Harassment, Discrimination & Retaliation Reporting Guidance, which includes information regarding the Company's investigation and remediation processes, or contact Global Ethics & Compliance at ethicsandcompliance@bbw.com.

Individuals are also advised to immediately document any incidents involving unlawful harassment or sexual assault.

RETALIATION PROHIBITED

No one will be subject to, and Bath & Body Works prohibits, any form of discipline, reprisal, intimidation, or retaliation for reporting of incidents of harassment of any kind, pursuing any harassment claim, or cooperating in related investigations. For more information on Bath & Body Works' policy prohibiting retaliation, please [click here](#) to access the Company's Anti-Retaliation Policy or contact Global Ethics & Compliance at ethicsandcompliance@bbw.com.

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ADMINISTRATION OF THIS POLICY

Global Ethics & Compliance is responsible for the administration of this Policy. If you have any questions regarding this Policy or questions about harassment that are not addressed in this Policy, please contact Global Ethics & Compliance at ethicsandcompliance@bbw.com.