



BATH & BODY WORKS HARASSMENT, DISCRIMINATION & RETALIATION REPORTING GUIDANCE

INTRODUCTION

Bath & Body Works (the “Company”) believes that understanding, investigating when appropriate, and responding to associate concerns promotes workplace satisfaction and improves the workplace overall by rooting out and correcting problems as they arise. We have adopted this Harassment, Discrimination & Retaliation Reporting Guidance (“Guidance”) to provide associates with clear instructions regarding how and where to report possible violations of the Company’s Sexual Harassment Prevention Policy, Civility, Anti-Discrimination and Other Harassment Prevention Policy, and Anti-Retaliation Policy. This Guidance applies to all associates (collectively, “associates”).

COMPLAINT PROCEDURE: INTERNAL

If you are subjected to any conduct that you believe violates the Company’s Sexual Harassment Prevention Policy, Civility, Anti-Discrimination and Other Harassment Prevention Policy, Anti-Retaliation Policy or another policy, or witness any such conduct, you should promptly report the conduct, either orally or in writing. You may also speak to, write, or contact any of the following internal resources:

- Your direct supervisor or, if the conduct involves your direct supervisor, any other manager or supervisor;
- Your Human Resources partner;
- Global Ethics & Compliance at ethicsandcompliance@bbw.com; or
- The Ethics Hotline.
 - The Ethics Hotline is operated by an independent third party and allows individuals to report concerns anonymously (where permitted by law) and provides translation services to support individuals who make reports in a language other than English.
 - Information reported to the Ethics Hotline is only shared with departments with a need to know of such complaint, such as Global Ethics & Compliance, Human Resources, and/or the Legal Department.

Contractors, including models, may report violations of the Sexual Harassment Prevention Policy, Civility, Anti-Discrimination and Other Harassment Prevention Policy, or Anti-Retaliation Policy to any Company manager, the photo shoot monitor, or directly to the Company through the Ethics Hotline.

Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses.

INVESTIGATION

Upon receipt of a complaint, we will implement interim remedial measures and accommodations as appropriate to ensure the complainant’s safety, health, emotional well-being, and ability to work, for example, instructing the person who is the subject of the complaint to refrain from communications with the complainant (person who submitted the complaint), providing counseling or paid time off to the complainant, etc. If after an initial inquiry sufficient information exists to establish that the conduct alleged violates the Sexual Harassment Prevention Policy, Civility, Anti-Discrimination and Other Harassment Prevention Policy, Anti-Retaliation Policy, or another policy, the Company will proceed to an investigation.

A prompt, thorough investigation will be conducted by investigators in an impartial manner that provides all parties with appropriate due process and reaches reasonable conclusions based on the evidence collected. The complainant and the person accused of misconduct will be interviewed by the assigned investigator separately and will be allowed to provide evidence to the investigator separately. Associates who have raised concerns about sexual harassment, gender discrimination, or retaliation on the basis of sexual harassment or gender discrimination may also be accompanied at any investigatory proceeding by an individual whose sole role is to provide emotional support to the complainant but otherwise may not participate in the investigatory process. This person may not be legal counsel.

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We will also maintain appropriate documentation and tracking. To the extent possible and reasonable, we will also maintain the confidentiality of complainants, witnesses, respondents, and information obtained during the investigation.

INVESTIGATION OUTCOME

At the close of the investigation, the Company will determine whether a policy has been violated based upon its reasonable evaluation of the information gathered during the investigation. The Company will inform the complainant and the person accused of misconduct of the results of the investigation. The Company will consider appropriate and proportional options for remedial actions and resolutions, and if misconduct is found, take prompt, corrective action. Remedial action may include, but is not limited to, oral or written counseling, referral to formal counseling, disciplinary action or probation, and termination of employment.

No Company associates are exempt from this policy or the Company's Sexual Harassment Prevention Policy, Civility, Anti-Discrimination and Other Harassment Policy, and Anti-Retaliation Policy. Individuals found responsible for engaging in misconduct will be held accountable in even-handed ways and appropriately disciplined regardless of their role within the Company. Nonetheless, the Company will not use complaints raised under our policies as a pretext for disciplining associates for other reasons. Further, associates who engage in conduct that rises to the level of a violation of law can be held personally liable for such conduct.

REPORTING

We are committed to enforcing our Sexual Harassment Prevention, Civility, Anti-Discrimination and Other Harassment Prevention Policy, Anti-Retaliation Policy and other policies. However, the effectiveness of our efforts depends in part on associates telling us about any inappropriate workplace conduct. If you believe that you or someone else may have been subjected to conduct that violates our policies, you should report it immediately. If associates do not report misconduct, we may not become aware of a possible violation of these policies and may not be able to take appropriate corrective action.

SUPERVISOR RESPONSIBILITIES

Supervisors and managers – even temporarily serving in such a capacity - have an obligation to report sexual or other harassment, discrimination, retaliation, or other misconduct of which they become aware. Supervisors and managers who observe such conduct or who receive any complaints of misconduct must report the conduct or complaint to their Human Resources partner or Global Ethics & Compliance so the Company can investigate and take corrective action, if appropriate.

ADMINISTRATION OF THIS POLICY

Global Ethics & Compliance is responsible for the administration of this policy. If you have any questions regarding this policy, please contact Global Ethics & Compliance at ethicsandcompliance@bbw.com.



APPENDIX A

ADDITIONAL JURISDICTION-SPECIFIC INFORMATION REGARDING SEXUAL HARASSMENT

California Associates

All associates of the Company are required to undergo harassment prevention training as required by applicable law. For more information on this training requirement, associates can visit <https://calcivilrights.ca.gov/shpt/>.

Connecticut Associates

Sexual harassment is illegal and prohibited by Connecticut and federal law in the workplace, pursuant to § 46a-60(a)(8) of the Connecticut General Statutes and Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq.

While associates are encouraged to report claims internally, if an associate believes that they have been subjected to sexual harassment, the associate may file a formal complaint with the Connecticut Commission on Human Rights and Opportunities (the "Commission") at 860-541-3400, CT Toll Free 1-800-477-5737, or online at www.ct.gov/CHRO.

Individuals who engage in acts of sexual harassment may be subject to civil penalties in the form of a cease and desist orders, back pay, compensatory damages, hiring, promotion or reinstatement, emotional distress, as well as attorney's fees, costs, pre- and post- judgment interest and punitive damages (if the case is tried in court). Individuals may also be subject to additional criminal penalties stemming from acts of sexual harassment.

Connecticut law requires that a written complaint be filed with the Commission within 300 days of the date the alleged harassment.

Illinois Associates

In compliance with the Illinois Human Rights Act ("Act") and the City of Chicago Human Rights Ordinance ("Ordinance"), all associates have the right to be free from unlawful discrimination or sexual harassment. This means that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act or Ordinance. This applies to all employer actions, including hiring, promotion, discipline and discharge. Sexual harassment is illegal and the Company expressly prohibits such actions and behavior.

Sexual harassment means any (i) unwelcome sexual advances or any unwelcome conduct of a sexual nature; or (ii) requests for sexual favors or conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment; or (iii) sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual's employment position.

Associates also have the right to reasonable workplace accommodations based on pregnancy and disability. This means associates can ask for reasonable changes to their job if needed because they are pregnant or disabled. It is also unlawful for employers to treat people differently or otherwise retaliate against an associate because they have reported discrimination or sexual harassment, participated in an investigation, or helped others exercise their right to complain about discrimination or sexual harassment.

Aside from the internal complaint process at the Company, associates may choose to file a charge/complaint of discrimination or sexual harassment with the Illinois Department of Human Rights

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("IDHR") as set forth below or other agencies as set forth in the Company's Harassment, Discrimination & Retaliation Reporting Guidance.

The charge process for violations of the law can be initiated by completing the form at www.illinois.gov/dhr or by contacting the IDHR at IDHR.Intake@illinois.gov, or either the Chicago Office or Springfield Office at the contact information set forth in the Company's Harassment, Discrimination & Retaliation Reporting Guidance.

Associates also can contact the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.

Chicago Associates

Definition of Sexual Harassment

Sexual harassment is defined by the Municipal Code of Chicago § 6-10-020(m) as any:

- (i) unwelcome sexual advances or unwelcome conduct of a sexual nature; or
- (ii) requests for sexual favors or conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or (2) submission to or rejection of such conduct by an individual is used as the basis for any employment decision affecting the individual or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment; or
- (iii) sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual's employment position.

Sexual harassment and retaliation for reporting sexual harassment are illegal in Chicago.

Training Requirements

All associates working within the City of Chicago are required to undergo at least one hour of sexual harassment prevention training and one hour of bystander training annually, while all individuals responsible for supervising or managing associates are required to participate in at least two hours of sexual harassment prevention training as well as one hour of bystander training annually.

Maine Associates

While associates are encouraged to report claims internally, if an associate believes that the associate has been subjected to sexual harassment, the associate may file a formal complaint with the government agency or agencies set forth below. Using the Company's complaint process does not prohibit an associate from filing a complaint with the Maine Human Rights Commission at the contact information set forth in the Company's Harassment, Discrimination & Retaliation Reporting Guidance. Associates may file a complaint with the Maine Human Rights Commission within 300 days of the date of alleged sexual harassment.

Massachusetts Associates

While associates are encouraged to report claims internally, if an associate believes that they have been subjected to sexual harassment, the associate may file a formal complaint with the Massachusetts Commission Against Discrimination (MCAD) or the Federal Equal Employment Opportunity Commission (EEOC) at the government agency or agencies at the contact information set forth in the Company's Harassment, Discrimination & Retaliation Reporting Guidance.

New York Associates

State Human Rights Law (HRL)

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 *et seq.*, applies to employers in New York State with regard to sexual harassment, and protects associates, paid or unpaid interns and

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non-employees regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with DHR or in New York State Supreme Court.

Complaints with DHR may be filed any time within three years of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL, within three years of the alleged discrimination. An individual may not file with DHR if they have already filed an HRL complaint in state court.

Complaining internally to Bath & Body Works does not extend your time to file with DHR or in court. The three years is counted from date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

DHR will investigate your complaint and determine whether there is probable cause to believe that discrimination has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If discrimination is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying monetary damages, attorney's fees and civil fines.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458, (718) 741-8400, www.dhr.ny.gov.

Contact DHR at (888) 392-3644 or visit dhr.ny.gov/complaint for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

Civil Rights Act of 1964

The EEOC enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e *et seq.*). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief, but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

If an associate believes that they have been discriminated against at work, they can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (1-800-669-6820 (TTY)), visiting their website at www.eeoc.gov or via email at info@eeoc.gov.

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they work to find out if such a law exists. For example, associates who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC

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Commission on Human Rights, 22 Reade Street, 3rd Floor, New York, New York 10007; call 311 or (212) 306-7450; or visit www.nyc.gov/html/cchr/html/home/home.shtml.

Contact the Local Police Department

If the harassment involves physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

New York State Division of Human Rights Hotline

The New York State Division of Human Rights has established a toll-free confidential hotline to provide counsel and assistance to individuals who believe they are experiencing workplace sexual harassment. Associates can call the toll-free sexual harassment hotline at 1-800-HARASS-3 Monday through Friday, 9:00 AM to 5:00 PM.

Oregon Associates

Non-Disclosure or Non-Disparagement Agreements

Under this Policy, a *non-disclosure agreement* is any agreement by which one or more parties agree not to discuss or disclose information regarding any complaint of work-related harassment, discrimination, or sexual assault, including the amount or terms of a settlement.

A *non-disparagement agreement* is any agreement by which one or more parties agree not to discredit or make negative or disparaging written or oral statements about any other party or the company.

A *no-rehire provision* is an agreement that prohibits an associate from seeking reemployment with the company and allows a company to not rehire that individual in the future.

Bath & Body Works will not require a former, current or prospective associate in Oregon to enter into any agreement if the purpose or effect of the agreement prevents the associate from disclosing or discussing conduct constituting discrimination, harassment, or sexual assault.

An associate claiming to be aggrieved by discrimination, harassment, or sexual assault may, however, voluntarily request to enter into a settlement, separation, or severance agreement which contains a non-disclosure, non-disparagement, or no-rehire provision and will have at least seven days to revoke any such agreement. Bath & Body Works will not offer a settlement on the condition of a request for these terms.

Time Limitations

Nothing in this policy precludes any person from filing a formal grievance in accordance with a collective bargaining agreement (if applicable), the Bureau of Labor and Industries' Civil Rights Division or the Equal Employment Opportunity Commission. Note that Oregon state law requires that any legal action taken on alleged discriminatory conduct (specifically that prohibited by ORS 659A.030, 659A.082 or 659A.112) commence no later than five years after the occurrence of the violation. Other applicable laws may have a shorter time limitation on filing.

Contact Information for the Bureau of Labor & Industries can be found in the Company's Harassment, Discrimination & Retaliation Reporting Guidance.

Rhode Island Associates

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to sexual harassment, the employee may file a formal complaint with the Rhode Island Commission for Human Rights or the Federal Equal Employment Opportunity Commission (EEOC) at the

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government agency or agencies at the contact information set forth in the Company's Harassment, Discrimination & Retaliation Reporting Guidance. Using the Company's complaint process does not prohibit an employee from filing a complaint with these agencies.

Vermont Associates

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to sexual harassment, the employee may file a formal complaint with the Vermont Attorney General's Office or the Federal Equal Employment Opportunity Commission (EEOC) at the government agency or agencies at the contact information set forth in the Company's Harassment, Discrimination & Retaliation Reporting Guidance. Using the Company's complaint process does not prohibit an employee from filing a complaint with these agencies. Employees may file a complaint with the agencies noted above within 300 days of the date of alleged sexual harassment.

Washington Associates

Nothing in this policy precludes an associate from filing a complaint with the Washington State Human Rights Commission at 1-800-233-3247 or by visiting <https://www.hum.wa.gov/file-complaint>. For additional support, individuals may also contact the Washington Coalition of Sexual Assault Programs at (360) 754-7583 or visiting <https://www.wcsap.org/contact>.

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APPENDIX B **COMPLAINT PROCEDURE: EXTERNAL**

Harassment is not only prohibited under Bath & Body Works' policies. Harassing behavior found to be misconduct under our policies may also be considered to be unlawful harassment, which is prohibited by state, federal, and where applicable, local law. Aside from Bath & Body Works' internal processes, associates may also choose to pursue legal remedies by filing a complaint with the following governmental agencies:

- Equal Employment Opportunity Commission (EEOC) at 800-669-4000 or by visiting <https://www.eeoc.gov/contact-eeoc/>.

California Associates

- Civil Rights Department (CRD) at 800-884-1684 or by visiting <https://calcivilrights.ca.gov/>.

Connecticut Associates

- Connecticut Commission on Human Rights and Opportunities (the "Commission") at 860-541-3400, CT Toll Free 1-800-477-5737, or online at www.ct.gov/CHRO.

Illinois Associates

- Illinois Department of Human Rights ("IDHR") at:
 - Chicago Office, 555 W. Monroe St., 7th Floor, Chicago, IL 60661, (312) 814-6200, (866) 740-3953 (TTY), (312) 814-6251 (Fax)
 - Springfield Office, 535 W. Jefferson Street, 1st Floor, Springfield, IL 62702, (217) 785-5100, (866) 740-3953 (TTY), (217) 785-5106 (Fax)
- Associates also can contact the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.

Chicago Associates

- Chicago Commission on Human Relations at 740 N. Sedgwick Street, 4th floor, Chicago, IL 60654 or (312) 744-4111.
- United States Equal Employment Opportunity Commission at JCK Federal Building, 230 S Dearborn Street, Chicago, IL 60604, Filing of Private Sector Charges/Enforcement/Federal Sector Hearings: Suite 1866, Mediation Unit/Legal Unit: Suite 2920, 1-800-669-4000, 312-588-1260 (Fax)

Maine Associates

- Maine Human Rights Commission, 51 State House Station, Augusta, ME 04333-0051, PHONE: 207-624-6050, TTY/TTD: 207-624-6064, FAX: 207-624-6063

Massachusetts Associates

- Massachusetts Commission Against Discrimination (MCAD) at:
 - One Ashburton Place, Rm 601, Boston, MA 02108 or (617) 994-6000.
 - 436 Dwight Street, Room 220, Springfield, MA 01103 or (413) 739-2145
 - Denholm Building, 484 Main Street, Room 320, Worcester, MA 01608 or (508) 453-9630
- (Federal) Equal Employment Opportunity Commission (EEOC) at John F. Kennedy Federal Building, 15 New Sudbury Street, Room 475, Boston, MA 02203, (800) 669-4000 or (800) 669-6820 TTY

New York Associates

- New York State Division of Human Rights (DHR), One Fordham Plaza, 4th Floor, Bronx, NY 10458 or 1-800-HARASS-3 (1-800-427-2773) or by visiting <https://dhr.ny.gov/complaint>.

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New York City Associates

- Law Enforcement Bureau of the NYC Commission on Human Rights, 22 Reade Street, 3rd Floor, New York, New York 10007; call 311 or (212) 306-7450; or visit www.nyc.gov/html/cchr/html/home/home.shtml.

Oregon Associates

- Bureau of Labor & Industries (BLI) at 800 NE Oregon St., Suite 1045, Portland, OR 97232, (971) 673-0761, or by visiting <https://www.oregon.gov/boli/workers/Pages/employment-discrimination-questionnaire.aspx>.

Rhode Island Associates

- Rhode Island Commission for Human Rights at 180 Westminster Street, 3rd Floor, Providence, RI 02903, (401) 222-2661, or by visiting <http://www.richr.ri.gov/filecharge/index.php>.

Vermont Associates

- Vermont Attorney General's Office, Civil Rights Unit, 109 State Street, Montpelier, VT 05609 or (802) 828-3657 (voice/TDD)

Washington Associates

- Washington State Human Rights Commission at 1-800-233-3247 or by visiting <https://www.hum.wa.gov/file-complaint>.

Washington, D.C. Associates

- Office of Human Rights (OCR) at (202) 727-4559 or by visiting <https://ohr.dc.gov/service/file-discrimination-complaint>.

If you wish to pursue filing with these agencies you should contact them directly to obtain further information about their processes and time limits.