



**Subject:** Equal Opportunity Employment Policy

**Policy Number:** E-HR-US101

**Business Unit:** All

**Effective Date:** November 1, 2021

**Function:** All

**Owner:** Chief Human Resources Officer

**Territory:** United States

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## **PURPOSE**

The Company makes employment decisions on the basis of merit because we want to have the best available workers in every job. The Company administers its personnel policies, programs, and practices in a nondiscriminatory manner in all aspects of the employment relationship, including, but not limited to, recruitment, hiring, work assignment, promotion, transfer, discipline, termination, wage and salary administration, and training. The purpose of this policy is to establish, communicate, and reaffirm the Company commitment to equal employment opportunity and nondiscrimination in compliance with all applicable federal, state and local laws. This Policy should be read together with the Global Inclusion, Diversity & Equity Policy (E-HR-GL004), Reasonable Accommodation Policy (E-HR-US105), Harassment Free Workplace Policy (E-HR-GL005), Religious Accommodation Policy (E-HR-US128), and No Retaliation Policy (E-HR-GL021).

## **DEFINITIONS**

**Company** – Refers to entities that employ workers and are subsidiaries of Tenneco Inc.

## **POLICY**

The Company prohibits discrimination and harassment of any type and affords equal employment opportunities to team members and applicants without regard to race, color, religion, sex (including pregnancy), sexual orientation, gender identity (including status as a transgender individual), national origin or ancestry, ethnicity, age, veteran or military status, physical or mental disability, marital or parental status, alienage or citizenship status, creed, status as a victim of domestic violence, genetic information, or any other category protected by federal, state, or local law.

The Company also prohibits unlawful discrimination and harassment based on a perception that an individual has or is associated with someone who has any of those characteristics. All such discrimination is unlawful and will not be tolerated.

**Pay Transparency:** The Company will not discharge or in any other manner discriminate against team members or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another team member or applicant. However, team members who have access to the compensation information of other team members or applicants as a part of their essential job functions cannot disclose the pay of other team members or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the Company's legal duty to furnish information.



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**Reasonable Accommodation of Disabilities:** The Company will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified applicant or team member with a disability, unless doing so would cause undue hardship. Any team member who requires an accommodation should should contact Human Resources for assistance.

**No Retaliation:** No one will be subject to, and the Company prohibits, any form of discipline, reprisal, intimidation, or retaliation for good faith reports or complaints of incidents of discrimination of any kind, pursuing any discrimination claim, or cooperating in related investigations.

**No Harassment:** The Company is committed to providing a work environment where all Team Members and others who do business with the Company, regardless of position or status, are treated with dignity, respect and equality regardless of the individual's race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status, age, marital status, alienage or citizenship, creed, genetic predispositions or carrier status, status as a victim of domestic violence, disability or other categories protected by federal, state, or local law. Behavior that is contrary to this commitment will not be tolerated, whether committed by or directed toward subordinates, co-workers, managers, suppliers or customers.

**Reporting Possible Violations:**

1. All team members are responsible for following this policy. The Company is committed to enforcing this policy against all forms of discrimination. However, the effectiveness of its efforts depends largely on team members reporting inappropriate workplace conduct, otherwise, the Company may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.
2. Supervisors are required for immediately reporting to Human Resources any behavior that may be in violation of the Company's Equal Employment Opportunity, No Retaliation, and Harassment Free Workplace Policies.
3. Team members are highly encouraged to report suspected policy violations to a member of management, to Human Resources or directly to the Chief Ethics and Compliance Officer. Team Members may also contact the Tenneco Hotline at <http://www.tennecohotline.ethicspoint.com/> or by calling toll-free 1-866-828-8388. The Company's Hotline is an anonymous service administered by Navex Global, an independent compliance services provider that has been hired by the Company to accept and obtain answers for complaints from team members who prefer not to go through their direct chain of command.



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**CONSEQUENCES**

Failure to follow any Tenneco policy may result in disciplinary action, up to and including termination of employment.

**REFERENCES**

|            |   |
|------------|---|
|            | Code of Conduct                             |
| E-HR-GL004 | Global Inclusion, Diversity & Equity Policy |
| E-HR-GL005 | Harassment Free Workplace Policy            |
| E-HR-US105 | Reasonable Accommodation Policy             |
| E-HR-US128 | Religious Accommodation Policy              |
| E-HR-GL010 | No Retaliation Policy                       |