

The following pages have been extracted from Etsy's 2022 Employee handbook.

## **Violation of Company Policies**

As a community, we take our policies seriously. Employees who violate any of the policies in this Handbook may be subject to discipline, up to and including termination of employment, regardless of whether these consequences are mentioned in specific policies.

## **Equal Employment Opportunity Policy**

Etsy is an equal employment opportunity employer, fully committed to providing equal opportunity in all areas of employment practices. Our differences make us a unique group working together to make the company a success. We seek to use the talents of all available and qualified personnel and applicants.

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Etsy will be based on merit, qualifications, and abilities. Employment practices will not be influenced or affected by an applicant's or employee's gender (including based on pregnancy, childbirth, or related medical conditions, gender identity or expression), sex, sexual orientation, race, color, (for India employees: caste; for Canada employees: ancestry, place of origin, record of offences, family status, creed) religion or belief, marital status, ethnic or national origin, age, disability, military or veteran status, citizenship status, personal health choices, or any other characteristic protected by applicable law. Both the law and Etsy policy prohibit discrimination based on protected characteristics or membership in a protected class. Discrimination refers to treating a person or group less well because of their membership in a protected class.

All employees and community members have an obligation to refrain from engaging in discriminatory conduct at all times while representing Etsy, including while on Etsy's premises, during work-related trips or events, while engaging in Company business, or when interacting with other members of our community in person or online. We expect our employees and community members to uphold Etsy values and respect others wherever they are.

This equal employment opportunity policy applies to all employment practices, including but not limited to recruiting, hiring, advertising, promotion, transfer, reductions in force, social and recreational programs, training, employee development, compensation and fringe benefits, discipline and termination.

If you believe that this policy has been violated, you should report the incident immediately to your manager, anyone in Human Resources, and/or one of our Employment Counsel. Any reported incident concerning policy violations will be investigated promptly and thoroughly, and anyone reporting a violation of this policy, or assisting in an investigation of such a report, will be protected from retaliation, reprisal, coercion, intimidation, interference, and discrimination. Complaints and actions taken to resolve complaints will be handled as confidentially as possible given the needs of the investigation and any applicable remedial action. An employee who violates this policy in any way may be subject to disciplinary action up to and including immediate termination, in accordance with applicable law.

Sometimes, you may raise an issue about team dynamics, onboarding frustration, or unclear roles and responsibilities that you need help navigating, but that may not rise to the level of a Handbook, law, or policy violation. Still reach out to your manager or to HR. We are here to help!

# **Policy Against Harassment**

Etsy's Policy Against Harassment is to provide a work environment that is free from harassment and bullying from anyone you work with, including fellow Etsy employees, contractors, vendors, partners, and customers who use our Etsy.com marketplace (including buyers and sellers). Harassment and bullying are prohibited in any form within any of our offices, or within the virtual environment, and during work-related events that take place off site, such as during business trips, business meetings, and business-related social events. In particular, Etsy will not tolerate harassment of any kind, including but not limited to harassment based on gender (including based on pregnancy, childbirth, or related medical conditions,), gender identity or expression), sex, sexual orientation, race, color, (for India employees: caste; for Canada employees: ancestry, place of origin, record of offences, family status, creed) religion, ethnicity, national origin, age, disability, or any characteristic protected by applicable law.

Harassment includes any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Sexual harassment specifically is unwelcome conduct of a sexual nature that can reasonably be considered intimidating, humiliating, degrading or offensive. Harassment (including sexual harassment) includes but is not limited to the following examples of conduct that may be considered offensive:

- Verbal or written comments or slurs related to an individual's age, race, gender, color, religion, national origin, disability, or sexual orientation or other characteristics protected by applicable law;
- Unwelcome sexual flirtations, advances, or repeated requests for a date or relationship with someone who has expressed their disinterest;
- Explicit or degrading verbal comments about another individual's appearance;
- The display of sexually suggestive pictures or objects in any workplace location including electronic transmission or display, and including displaying, storing, or transmitting pornographic or sexually oriented materials using company equipment or facilities. However, it is understood that certain employees, such as members of our Trust and Safety team, may need to access such material for work.
- Any sexually offensive or abusive physical conduct such as assault, unwanted touching, or blocking normal movement;
- The taking of, or the refusal to take, any personnel action based on an employee's submission to or rejection of sexual overtures;
- Telling jokes or displaying cartoons that relate to an individual's age, race, gender, color, religion, national origin, disability, sexual orientation or any other characteristic protected by law.
- Visual conduct such as derogatory posters, photographs, cartoons, drawings, or gestures;
- Communications containing statements that may be offensive to individuals in a particular

protected group, such as racial or ethnic stereotypes or caricatures;

- Indecent exposure
- Retaliation or threatened retaliation for making or threatening to make harassment reports, or for participating in an investigation into harassment allegations.

Sexual harassment is a specific type of harassment that is, like all harassment, against the law and against Etsy policy. Sexual harassment has been defined according to our guidelines as including unwelcome sexual advances, requests for sexual favors, and other verbal, psychological or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition, either explicitly or implicitly, of an individual's employment;
- Submission to or rejection of such conduct by an individual is used as a factor in decisions affecting that individual's employment; or
- Such conduct has the purpose or effect of interfering with an individual's work performance or creates an intimidating, hostile, or offensive working environment.

If you believe that you are being subjected to workplace harassment, or you believe you have observed workplace harassment, it is your obligation as an employee to report it immediately to your manager, Human Resources, and/or one of our Employment Counsel. If you are not comfortable reporting it to your direct manager, Human Resources, or our Employment Counsel, you may also file an anonymous complaint via Etsy's whistleblower hotline, by phone at (866) 887-9755 or online at <a href="https://etsy.i-sight.com/portal">https://etsy.i-sight.com/portal</a>. If you feel safe doing so, please also promptly and directly notify the offender that their behavior is inappropriate, and request that they stop.

Etsy takes its responsibility to protect its employees from harassment and discrimination seriously. Employees who have experienced conduct they believe is contrary to Etsy's policies against harassment, discrimination and retaliation have an obligation to raise their concerns internally, to the extent permissible by local law, to give the Company the opportunity to investigate and remediate any concerns to the extent applicable. Employees have the right to contact city and state human rights agencies directly to raise concerns about violations of this policy and are expressly protected from retaliation for doing so: New York State, New York City, Illinois, Chicago, San Francisco, California.

As a manager, you are obligated to bring any claims or reports of harassment to Human Resources or to one of our Employment Counsel. Any reported incident will be investigated promptly and thoroughly. Complaints and actions taken to resolve complaints will be handled as confidentially as possible given the needs of the investigation and any applicable remedial action.

**For New York employees:** The state of New York operates a confidential hotline for complaints of workplace sexual harassment. The hotline number is 1-800-HARASS-3. The hotline is open during regular business hours and is staffed by the New York State Divison of Human Rights Office of Sexual Harassment Issues (OSHI). OSHI staff will provide callers with information about filing a sexual harassment complaint with the agency and, if the caller is interested in discussing their case with an attorney, the hotline will provide them with the name and contact information of an attorney

who is experienced in providing counsel related to workplace sexual harassment and who has volunteered to provide limited pro bono assistance.

For UK and Ireland employees: We ask that you do not publish your concerns outside of Etsy without, at the very least, having allowed us to address them internally. In addition to the above, if you are based in the UK and do not feel able to speak to us directly or if you wish to talk through your concerns with another party, you might want to contact <a href="Protect Advice">Protect Advice</a>: an independent UK charity providing confidential advice on whistleblowing. They can be contacted on 020 3117 2520. Please also follow the Grievance Procedure set out in the supplement for your country if you have a concern about the way you have been treated as an individual.

**For Ireland employees**: Please refer to the Dignity at Work policy in the Ireland supplement for more detail about the laws that apply to you concerning workplace harassment.

**For India employees**: Please refer to the Policy Against Sexual Harassment (POSH) in the India supplement for your applicable sexual harassment policy.

**For Canada employees:** Please refer to the Investigation Procedure section of the Canada supplement for information on investigation procedures.

### **Retaliation is Prohibited**

Retaliation against an employee who, in good faith, reports a suspected violation of Etsy's Equal Employment Opportunity Policy or Policy Against Harassment or who cooperates in an investigation related to the subject matter of those policies is prohibited. Retaliation consists of any adverse action that would have deterred a reasonable person from coming forward and engaging in protected activity, such as making a complaint or participating in an investigation related to these policies. Retaliation may include, but is not limited to, termination, demotion, or a negative change in salary or benefits.

If you believe you have been the victim of retaliation, please report your concerns to your manager, Human Resources, and/or our Employment Counsel. Complaints of retaliation will be investigated promptly and thoroughly. As with complaints of discrimination, and harassment, retaliation complaints will be handled as confidentially as practicable given the needs of the investigation and, if applicable, remedial action.

An employee who violates this policy will be subject to disciplinary action up to and including termination from employment.

#### **Reasonable Accommodation**

For U.S. employees: Etsy provides reasonable accommodations to qualified individuals with disabilities in accordance with the Americans with Disabilities Act and analogous state and local laws. A reasonable accommodation may include a change in the work environment or in the way a

job is performed that enables a person with a disability to enjoy equal employment opportunities, provided the employee is otherwise qualified to perform all of the essential functions of the position and the accommodation does not constitute an undue hardship for the Company.

**For non-U.S. employees**: Please contact HR for any specific disability-related information in your jurisdiction. In general, Etsy operates to reasonably accommodate qualified people with disabilities, regardless of jurisdiction, whose disabilities might otherwise prevent them from doing the essential functions of their jobs. If you have a need for an accommodation or adjustment because of your disability, reach out to your manager or your HRBP.

Consistent with applicable federal, state, provincial, or local law, Etsy will also provide such reasonable accommodations to employees who have special needs due to religion, pregnancy or lactation.

If you feel that you need reasonable accommodation to perform the essential functions of your job, please contact your HRBP. Understand that the Company is not obligated to provide you with the exact reasonable accommodation that you request, and that the Company is permitted to ask you for supporting documentation in connection with your request.

For Canada, Mexico, UK and Ireland employees: Please refer to the handbook or supplement for your country.

Reasonable Accommodations for Pregnant Employees

Under applicable federal and local law, employees have the right to be free from discrimination on the basis of their pregnancy or conditions relating to their pregnancy, including but not limited to, the need to express breast milk for a nursing child. Additionally, employees may be entitled to reasonable accommodations for conditions related to pregnancy (such as temporarily modifying your work duties, providing you with a stool or chair, or allowing more frequent breaks, the need to express breast milk), so long as the accommodation does not pose an undue hardship on the Company.

Employees may make requests for reasonable accommodations to HR for review. Requests for reasonable accommodations will be evaluated on a case-by-case basis in consultation with the employee who has requested the accommodation. During this process, the Company will discuss and identify with the employee the precise limitations resulting from the condition and the potential accommodation(s) that the Company might make to help overcome those limitations. In certain circumstances and where permitted by applicable law, employees requesting reasonable accommodations may be required to provide documentation from a medical provider of the employee's workplace limitations.

Additionally, nursing parents will be provided reasonable break time each day to express breast milk. See our <u>Lactation Policy</u> for further details.

The Company prohibits discrimination and retaliation against any employee for exercising their rights under this policy.

This policy will be interpreted and applied in accordance with the California Pregnancy Disability Act, the Massachusetts Pregnant Workers Fairness Act, Connecticut Human Rights Act, regulations thereunder, and all other applicable laws, and to the extent that this policy may conflict with those laws, those laws are controlling over this policy.

For UK and Ireland employees: Please refer to the supplement for your country.

#### Standards of Professionalism

All Etsy employees must observe the highest standards of professionalism at all times and act in a manner that is consistent with our mission and guiding principles. Etsy employees should always treat each other, and every member of the Etsy community, with the utmost respect. For the avoidance of doubt, these standards apply to all community members, including employees, contractors, vendor partners, visitors, and guests.

The following are examples of the types of behavior and conduct that Etsy considers inappropriate. This list is by no means exhaustive.

- Falsifying employment or other Company records, including time and attendance records;
- Engaging in behavior that is fraudulent, or otherwise dishonest;
- Violating Etsy's equal employment opportunity policy or policy against harassment;
- Excessive absenteeism or tardiness, not covered by any applicable Company leave or vacation policy;
- Excessive, unnecessary, or unauthorized use of Company property and supplies, particularly for personal purposes;
- Reporting to work under the influence of drugs or alcohol, and the illegal manufacture, possession, use, sale, distribution or transportation of drugs (Please refer to <a href="Etsy Drug Free Workplace Policy">Etsy Drug Free Workplace Policy</a>);
- Violence or the threat of violence including but not limited to fighting or using obscene, abusive, or threatening language or gestures (Please refer to <a href="Etsy Violence in the Workplace Policy">Etsy Violence in the Workplace Policy</a>);
- Theft of property from co-workers, customers, or Etsy;
- Possession of firearms on Etsy premises or unauthorized possession of firearms while on Company business but not on Etsy premises
- Disregarding safety or security regulations; and
- Failing to maintain the confidentiality of the Company, any Etsy Member, or any business partner or vendor of Etsy.