

EXHIBIT I

Compilation of emails/memos distributing EEO policy documents

- A September 30, 2019 memo from the Chief Compliance Office of CBS Corporation to all CBS Corporation employees regarding CBS EEO Policy
- 2016 CBS Corporation Business Conduct Statement, page 10
- August 14, 2020 memo of the Chief Compliance Officer, ViacomCBS (now Paramount Global) and pages from the 2020 ViacomCBS Global Business Practices Statement
- December 13, 2021 memo from the President and CEO, ViacomCBS (now Paramount Global) and pages from the 2021 ViacomCBS Global Business Practices Statement

Paramount



September 30, 2019 Memo from the Chief Compliance Officer of CBS Corporation to all CBS Corporation employees regarding CBS EEO Policy

From: [Joe Ianniello and Hazel-Ann Mayers](#)
Subject: Updated CBS Non-Discrimination and Anti-Harassment Policy
Date: Monday, September 30, 2019 12:18:31 PM
Attachments: [CBS Non-Discrimination and Anti-Harassment Policy.pdf](#)
[Sexual Harassment Complaint Form.pdf](#)

Dear Colleagues,

At CBS, we are dedicated to maintaining a workplace that is safe, fair, and inclusive, where every employee, regardless of position, is respected and given the opportunities to develop and thrive. This commitment is non-negotiable and, as such, it is crucial that our work environment be free from discrimination, harassment, and retaliation.

Our **CBS Non-Discrimination and Anti-Harassment Policy**, also known as the CBS Equal Employment Opportunity (EEO) Policy, has been revised and is [attached](#) here for you to review. The policy describes our shared commitment to a positive work environment for everyone, requiring all of us to display a high standard of ethics in every situation. Importantly, the policy also syncs squarely with our overall ongoing cultural transformation.

We ask that you review and understand the policy and be prepared for any related training. As you will see, the policy increases the avenues available for reporting complaints, explaining how to report concerns to several internal sources, including your supervisor, Human Resources Business Partner, Human Resources Production Partner, or the Compliance department. The policy also describes how to report complaints to the new **CBS Openline website and hotline**, which are operated through an independent third party, NAVEX Global.

We also remind you of the **Complaint Form** ([attached](#)) that you may use to file a complaint of sexual harassment. You do not need to complete this form to file a complaint, but it is another avenue for reporting; it may be submitted to your Human Resources Business Partner, Human Resources Production Partner, the Compliance department, or the CBS Openline website.

We value all our employees, and integral to that value is ensuring that every day working for CBS is a day where dignity is assured and speaking up is encouraged and supported. If you have any questions, please do not hesitate to contact us, a member of the CBS Compliance department, or your Human Resources Business Partner.

Thank you for all that you do to make CBS a safe, fair, and inclusive place to work.

Joe and Hazel

CBS Compliance Officers

Hazel-Ann Mayers 212-975-2927
Sonya Cheney 212-975-1738

CBS Human Resources Contacts, by Business Unit:

Broadcast

Kevin Oldis

323-575-2743

Corporate and Sports	Bryn Berglund	212-975-5261
Global Television Distribution	Andrew Herreria	310-264-3335
Television Studios	Ellen Goldsmith	818-655-1741
Interactive	Elise Ben-Yair	818-568-1676
Publishing	Carolyn Connolly	212-698-1202
Showtime and Network/Digital Sales	Elizabeth Casanas	212-708-1469
Television Stations	Jessica Hurst	212-975-7545

CBS NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

CBS is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, CBS expects that all relationships among persons in the workplace will be professional and free of bias, prejudice and harassment. CBS does not tolerate any type of harassment, discrimination or retaliation; therefore, any such behavior will lead to disciplinary action, up to and including termination.

Equal Employment Opportunity

It is the policy of CBS to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), age, physical disability, mental disability, medical condition, ancestry, alienage or citizenship status, marital status, creed, genetic information, height or weight, sexual orientation, military or veteran's status, gender, gender identity, gender expression, transgender status, sexual and reproductive health decisions, or any other characteristic protected by law. In some jurisdictions such as in New York or California, traits historically associated with race (including hair texture and hairstyle) and religion (including wearing any attire or having facial hair in accordance with one's religion) are also protected characteristics. CBS prohibits and will not tolerate any such discrimination or harassment. Although the CBS Chief People Officer has the overall responsibility for the implementation of this policy, every individual working at CBS is expected to assist in the furtherance of this policy.

This means that it is each employee's responsibility to ensure that all personnel actions and practices are administered in a fair, equal and consistent manner that furthers the principles of equal employment opportunity. All recruiting, hiring, training, promotion, discipline and termination decisions in all job classifications must be based on valid and non-discriminatory criteria without regard to race, color, national origin, religion, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), age, physical disability, mental disability, medical condition, ancestry, alienage or citizenship status, marital status, creed, genetic information, height or weight, sexual orientation, military or veteran's status, gender, gender identity, gender expression, transgender status, sexual and reproductive health decisions, or any other characteristic protected by law.

Definitions of Harassment

a. Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: (a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment, regardless of whether the complaining individual is the intended target of any such harassment.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or activity or requests for sexual favors; sexual jokes and innuendoes; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through posting on walls, e-mail, text message, instant messenger, social media, or other electronic communication); other physical, verbal or visual conduct of a sexual nature; and conditioning employment opportunities (for example, hiring, promotion, or continued employment) on sexual favors. *Sex-based* harassment – that is, conduct not involving sexual activity or language (e.g., male manager yells only at female employees and not males) – or sex stereotyping (meaning that an individual's conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas and perceptions about how individuals of

either sex should act or look) – may also constitute discrimination or harassment if the conduct is directed at an individual *because of that person's sex*.

b. Harassment on the basis of all protected characteristics is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of race, color, national origin, religion, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), age, physical disability, mental disability, medical condition, ancestry, alienage or citizenship status, marital status, creed, genetic information, height or weight, sexual orientation, military or veteran's status, gender, gender identity, gender expression, transgender status, sexual and reproductive health decisions, or any other characteristic protected by law – including, in some jurisdictions such as in New York or California, traits historically associated with race (including hair texture and hairstyle) and religion (including wearing any attire or having facial hair in accordance with one's religion) – or that of an individual's relatives, friends or associates, and that: (a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (b) has the purpose or effect of unreasonably interfering with an individual's work performance; or (c) otherwise adversely affects an individual's employment opportunities. Harassing conduct includes, but is not limited to, epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including, but not limited to, through posting on walls, e-mail, text message, instant messenger, social media, or other electronic communication).

Individuals and Conduct Covered

These policies apply to and cover all applicants, employees, interns (whether paid or unpaid), contractors, temporary workers, vendors and any other individuals conducting business or providing services at CBS, regardless of immigration status, and prohibit harassment, discrimination and retaliation whether engaged in by fellow employees, by a supervisor or manager or by someone not directly connected to CBS (e.g., an outside vendor, consultant, or customer).

With regard to non-employees, the protections and prohibitions against discrimination and harassment in this policy apply to non-employees who provide services to CBS (including contractors, subcontractors, vendors, and consultants) while they are on CBS premises and/or while engaged in conducting business for or on behalf of CBS ("covered non-employees"). Covered non-employees include persons commonly referred to as "gig" workers and temporary workers, as well as persons providing equipment repair, cleaning services, or any other services provided pursuant to a contract with CBS. Therefore, this policy: (i) prohibits discrimination and harassment engaged in by covered non-employees, whether directed at a fellow covered non-employee or an employee or intern of CBS; and (ii) prohibits discrimination and harassment directed at covered non-employees, whether engaged in by a fellow covered non-employee or by an employee or intern of CBS.

Conduct prohibited by these policies is unacceptable in the workplace (including on set or other project-related worksites) and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events. Any individual who engages in such harassment by any means, including, but not limited to, in person behavior, through the use of computers, e-mail, telephone, or social media or any other means, whether on work or personal devices or during non-work hours, will be subject to discipline, up to and including termination.

Supervisory Responsibility

Managers and supervisors are charged with additional responsibilities because of their positions of authority within CBS. Managers and supervisors are required to promote a work environment where individuals feel safe and comfortable asking questions or raising concerns about these policies, and to make themselves available to listen to and discuss concerns. As such, managers and supervisors are responsible for any harassment and discrimination that should have been known to them with reasonable care and attention to the workplace for which they are responsible. While these duties are mandatory for managers and supervisors, they also are strongly encouraged for all individuals who are covered by this policy.

Managers and supervisors are required to report any complaint of harassment or discrimination they receive or any harassment or discrimination they observe, without exception. If a manager or supervisor receives a report of harassment or discrimination, or is otherwise aware of such conduct, they are required to promptly report it to the CBS Human Resources Department or to the CBS Compliance Officers, even where they may believe the conduct is trivial, or where an individual (including the complainant or otherwise) asks that it not be reported.

Managers and supervisors will be subject to discipline, up to and including termination, for failing to report any allegations or suspicions of harassment or discrimination, otherwise knowingly allowing harassment or discrimination to continue, or for engaging in any harassing, discriminatory, or retaliatory conduct themselves.

Retaliation Is Prohibited

CBS policy and federal, state and local law prohibit retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Retaliation is defined as an adverse action taken against an individual because that person engaged in protected activity. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation. Protected activities with regard to discrimination or harassment include making complaints about discrimination or harassment to a manager or supervisor or other person designated to receive complaints; making a report of suspected discrimination or harassment even where the individual is not the recipient; assisting another individual complaining of discrimination or harassment; filing a formal complaint about discrimination or harassment with a government agency; opposing discrimination or harassment; or providing information during an investigation of discrimination or harassment or providing testimony in connection with a complaint of discrimination or harassment. Retaliation is a serious violation of this policy and, like discrimination or harassment itself, will be subject to disciplinary action, up to and including termination.

What Retaliation Is Not

Negative employment actions do not rise to the level of retaliation simply because they occur after an employee engages in protected activity. Individuals continue to be subject to all CBS policies, job requirements and disciplinary rules regardless of their engaging in protected activity. This policy regarding retaliation is not intended to protect persons making intentionally false charges of discrimination or harassment.

Complaint Procedure

Reporting an Incident of Harassment, Discrimination or Retaliation

CBS strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe they have experienced conduct that they believe is contrary to CBS's policy or who have concerns about such matters should report their complaints to their immediate supervisor, their department head, any senior manager of the business unit, the CBS Human Resources Department (Human Resources Business Partner or Human Resources Production Partner), the CBS Chief People Officer, CBS Compliance Officers, or the CBS Openline at (844) 238-9006 or cbsopenline.ethicspoint.com. The Company has engaged NAVEX Global's EthicsPoint, an external vendor, to receive phone calls or online reports through our CBS Openline hotline and website.

Individuals should not feel obligated to file a complaint with their immediate supervisor before bringing the matter to the attention of one of the other CBS designated resources identified above. Supervisors or managers who receive a complaint of a violation of this policy must promptly report the complaint to the CBS Human Resources Department or to the CBS Compliance Officers.

CBS also has a Complaint Form (available from your Human Resources representative or at CBS & You) to report incidents of sexual harassment which individuals may complete if they prefer. Once the individual completes a Complaint Form, it should be submitted to the relevant Human Resources representative, a CBS Compliance Officer or the CBS Openline website at cbsopenline.ethicspoint.com.

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment, discrimination, or retaliation. Therefore, while no fixed reporting period has been established, CBS strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. Anyone, whether personally subjected to harassment, discrimination or retaliation, or a bystander who is a witness to such conduct, is encouraged to promptly report the incident. CBS will make every effort to stop alleged harassment, discrimination or retaliation, but can only do so with the cooperation of individuals working at CBS.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing or discriminatory conduct from promptly advising the offender that the behavior is unwelcome and requesting that it be discontinued.

The Investigation

Any reported allegations of harassment, discrimination or retaliation will be investigated fairly, promptly, thoroughly and impartially by the Human Resources Department, CBS's Compliance Department, or another appropriate party in a manner that provides all parties appropriate due process and reaches conclusions based on the evidence collected. This procedure will apply regardless of the manner in which the individual made the complaint. Upon receipt of the complaint, the designated investigator will conduct a prompt review of the allegations. The investigation may include, but is not limited to, individual interviews with the complainant, other parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. All individuals, including managers and supervisors, are required to cooperate with any internal investigation of harassment, discrimination or retaliation. Individuals must respond truthfully, promptly and fully to all inquiries made by the designated investigator. Withholding responsive information, providing incomplete information or attempting to mislead or misdirect any investigation (or encouraging or pressuring others to do so) may result in disciplinary action up to and including termination. As part of its investigation, CBS will review relevant documents (if any), which may include e-mails and text messages.

Each investigation will be tracked for reasonable progress and documented in writing, which will include documents reviewed, individuals interviewed, any relevant prior incidents, and how the complaint is resolved. Each complainant will be notified following the completion of the investigation and will be advised of the results of the investigation, whether corrective action was taken and the right to file a complaint externally. Individuals about whom a complaint was made will be notified as well. CBS will endeavor to complete the investigation as soon as possible, and will notify the complainant if it is unable to do so.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with a thorough investigation, appropriate corrective action and applicable law.

Responsive Action

Misconduct constituting harassment, discrimination or retaliation will be dealt with promptly and appropriately. Responsive action may include, for example, training, referral to counseling, monitoring of the offender and/ or disciplinary action such as warnings, reprimands, withholding of a promotion or pay increase, prospective reduction of wages, demotion, reassignment, temporary suspension without pay or termination, as CBS believes appropriate under the circumstances.

Additional Information About These Policies

Individuals who have questions or concerns about these policies should talk with their Human Resources Business Partner, Human Resources Production Partner, any member of the CBS Human Resources Department or a CBS Compliance Officer.

These policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions in order to avoid allegations of harassment. The law and the policies of CBS prohibit disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions, privileges and perquisites of employment. The prohibitions against harassment, discrimination

CBS COMPLAINT FORM FOR REPORTING SEXUAL HARASSMENT

If you believe that you have been subject to sexual harassment, you are encouraged to complete this form and submit it to a member of the Human Resources Department, a CBS Compliance Officer or the CBS Openline website (cbsopenline.ethicspoint.com). Once you submit this form, CBS will follow the procedures in our Non-Discrimination and Anti-Harassment Policy to investigate. CBS prohibits retaliation against employees who submit reports of sexual harassment and/or who participate in investigations related to sexual harassment.

You may also report an allegation of sexual harassment verbally or using any other reporting method outlined in CBS's Non-Discrimination and Anti-Harassment Policy.

Complainant Information

Name:

Job Title:

Work Location:

Work Phone:

Work Email:

Immediate Supervisor's Name:

Title:

Work Phone:

Preferred Communication Method (circle one): Email Phone In Person

Complaint Information

1. Your complaint of sexual harassment is made against:

Name:

Job Title:

Work Location:

Work Phone:

Relationship to You (circle one):

Supervisor Subordinate Co-worker Other

2. Please describe the conduct or incident(s) that forms the basis of this complaint and how it is affecting you and your work. Please use additional sheets if necessary and attach any relevant documents or evidence.

3. Date(s) the conduct or incident occurred:

4. Is the conduct or incident continuing? (circle one) Yes No
5. Please list the name(s) and contact information of any witnesses or individuals that may have information related to your complaint.
6. (Optional) Have you previously complained of or provided any information about sexual harassment at CBS? If yes, when and to whom did you complain or provide information?

I request that CBS investigate this complaint of sexual harassment using the procedures outlined in CBS's Non-Discrimination and Anti-Harassment Policy, and that CBS advise me of the results of the investigation.

Name

Signature

Date _____

If you have retained legal counsel and would like us to work with them, please provide their contact information.



2016 CBS Corporation Business Conduct Statement, page 10

CBS & YOU |  YOUR COMPLIANCE PROGRAM

2016 Business Conduct Statement

CBS CORPORATION BUSINESS CONDUCT STATEMENT



- ⊖ Using CBS assets, facilities or services for any improper purpose. You are personally responsible for all CBS funds and other assets over which you have control.
- ⊖ Committing CBS assets for services, transactions, or liabilities if you do not have the appropriate level of approval or signatory authority.
- ⊖ Fraud or falsification in the preparation, evaluation, review or audit of any financial statement of CBS or any document, record or information that is or may be used in any financial statement of CBS (for example, concealing or falsifying data given to internal or external auditors or used internally in the reporting of revenues).
- ⊖ Fraud or misrepresentation in the preparation, recording, evaluation, review or audit of an employee's expense report or any other financial document related to reimbursement of business-related expenses.
- ⊖ Any practice that results in customers or clients being charged for services that were not provided or being charged an inflated price or more than agreed upon for a service.
- ⊖ Any practice that intentionally results in the inflation or exaggeration of reported sales or revenues.
- ⊖ Fraud in the recording and maintaining of financial records of CBS (for example, intentionally recording sales or expenses in the wrong period, capitalizing items that should be expensed or recording personal expenses as business expenses).
- ⊖ Noncompliance with CBS's internal accounting controls (for example, not obtaining required approvals).
- ⊖ Misrepresentation to a senior officer or CBS's internal or external auditors or accountants regarding a matter contained in the financial records, financial reports or audit reports of CBS.
- ⊖ Deviation from full and fair reporting of CBS's results of operations, financial condition or cash flows.
- ⊖ Improperly influencing, coercing, manipulating or misleading any independent public or certified accountant engaged in the performance of an audit of CBS's financial statements.

You may not engage in any misleading or deceptive financial practice, whether or not it is listed here, and you are required to report any such practices if you become aware of them. Please refer to the Employee/Officer or Director Reporting Procedures described in the section entitled "Implementation of the CBS Business Conduct Statement" for procedures to report improper financial practices or financial misconduct matters that have come to your attention.

Improper Influence of Auditors

You may not take any action (whether or not listed as an example below), directly or indirectly, to coerce, manipulate, mislead or influence any of our auditors, when you know, should know or intend that your actions may render our financial statements misleading. For example, you may not influence an auditor to (i) issue a report on CBS's financial statements that is not warranted in the circumstances, (ii) refrain from performing audit, review or other procedures, (iii) refrain from issuing a report or withdrawing an issued report or (iv) refrain from communicating matters to CBS Corporation's Audit Committee.

As additional examples of prohibited conduct, you may not (i) offer money, gifts, financial incentives, future employment or contracts for nonaudit services, (ii) provide inaccurate or misleading legal analysis or other information, (iii) threaten to cancel an auditor's existing engagements, (iv) seek to have an audit partner removed from the engagement, (v) engage in blackmail or (vi) make physical or verbal threats.

EQUAL EMPLOYMENT OPPORTUNITY

CBS places a high value on providing equal employment opportunity and maintaining a diverse workforce. We work hard to comply with all applicable laws prohibiting discrimination and we strive to make our workforce reflect the rich diversity of our society and our customers. CBS recruits and hires without regard to race, color, national origin, religion, sex, age, physical disability, mental disability, medical condition, ancestry, alienage or citizenship status, marital status, creed, genetic information, height or weight, sexual orientation, military or veteran's status, gender, gender identity, gender expression,

transgender status or any other characteristic protected by law. We strive to administer all personnel actions such as hiring, compensation, promotions, benefits, transfers, layoffs, Company-sponsored training, education, tuition assistance, terminations and social and recreational programs in a manner consistent with equal employment opportunity.

All managers, directors and supervisory personnel are required to make a personal commitment to practice and enforce the principles of our equal employment opportunity policy.

VI. HARASSMENT-FREE WORKPLACE ENVIRONMENT

CBS has a "zero tolerance" policy for sexual harassment or harassment based on race, color, national origin, religion, sex, age, physical disability, mental disability, medical condition, ancestry, alienage or citizenship status, marital status, creed, genetic information, height or weight, sexual orientation, military or veteran's status, gender, gender identity, gender expression, transgender status or any other characteristic protected by law. Discriminatory treatment, including sexual harassment and harassment based on a person's race, age or other protected status, is strictly prohibited. CBS will take all steps necessary and appropriate to stop such acts of harassment or discrimination of which it becomes aware.

Unlawful harassment may occur not only as a result of conduct by supervisors, but also due to conduct by directors and/or fellow employees, and, under some circumstances, conduct by customers, vendors, consultants, visitors and independent contractors. Unlawful harassment can take place in the office or in work-related settings outside the workplace, such as during business trips, business meetings and business-related social events. This Statement applies with equal force to conduct in all such settings.

Sexual harassment may exist where compensation or other employment benefits are conditioned on granting sexual favors. Sexual harassment also may exist where there is a hostile work environment caused by a pattern of unwanted sexual advances or unwanted visual, verbal or physical conduct of a sexual nature.

Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature are sexual harassment when:

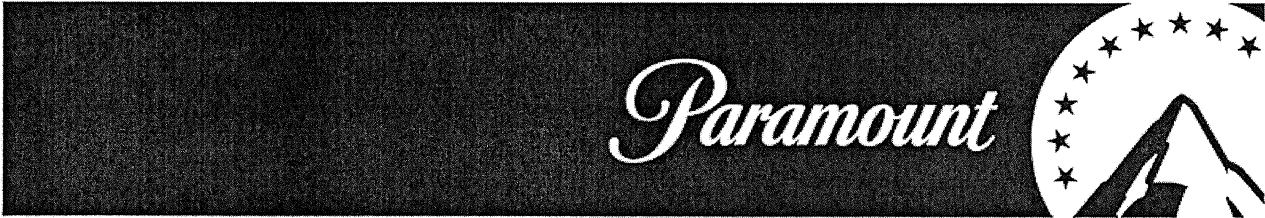
- ❑ Submission to the conduct is made, either explicitly or implicitly, a term or condition of the individual's employment.
- ❑ Submission to or rejection of the conduct by an individual is used as the basis for employment decisions affecting the individual (such as a promotion or a bonus).
- ❑ Or the conduct has the purpose or effect of unreasonably interfering with the individual's work performance or creating an intimidating, hostile, or offensive working environment.

CBS also believes in an environment that is free from workplace bullying and abusive conduct, regardless of whether the person is in a protected category. Bullying or abusive conduct is conduct with malice that a reasonable person would find hostile or offensive. Examples of what constitutes abusive or bullying conduct includes repeated use of insults, derogatory remarks and epithets; threatening, intimidating or humiliating verbal or physical conduct; and the gratuitous sabotage of a person's work performance. It does not include a single act unless it is especially severe and egregious, but CBS strongly discourages such behavior at any time.

Specific Examples of Inappropriate Work-Related Conduct

The following are examples of things you may not do; but the list is not exhaustive. CBS expects all directors, officers and employees to observe the spirit as well as the letter of the harassment-free workplace policy. For example, you may not do any of the following:

- ❑ Ask for dates, or make sexual advances, where it is clear, or becomes clear, that the overture is unwelcome.
- ❑ Threaten or engage in retaliation after an overture or inappropriate conduct is rejected or in response to the good faith reporting of such conduct.



August 14, 2020, memo from the Executive Vice President, Chief Compliance Officer and Chief Audit Executive of ViacomCBS and relevant pages from the 2020 ViacomCBS Global Business Practices Statement

From: Office of Henry Moniz
Sent: Friday, August 14, 2020 8:36 AM
To: (ViacomCBS) Office of Henry Moniz
Subject: ViacomCBS' Business Practices Statement & Reporting Hotline
Attachments: ViacomCBS' GLOBAL BUSINESS PRACTICES STATEMENT 2020.pdf

OFFICE OF
HENRY T. A. MONIZ
EVP, Chief Compliance Officer
and Chief Audit Executive

VIACOMCBS

Team,

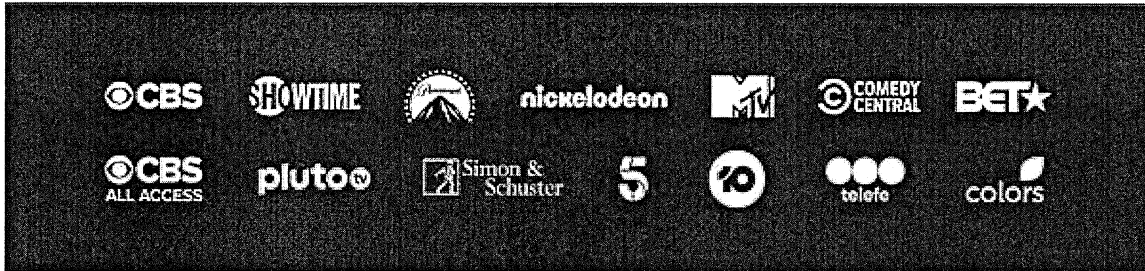
In the past few months we've lived through a series of extremely challenging events for the world, our country and the ViacomCBS community. Amidst these difficult times, we're heartened by our employees' ability to adapt, come together as a community and stand up for what is right.

With that in mind, The Office of Global Compliance wanted to remind employees about resources and standards for the whole community. It starts with a single document: our global [Business Practices Statement](#) (BPS). The BPS is ViacomCBS' code of conduct and supersedes all prior versions of legacy-CBS' Business Conduct Statement and legacy-Viacom's Business Practices Statement. It contains important policies on matters such as our organizational commitment to Diversity and Inclusion, Speaking Up, Anti-Harassment and many other important topics including, for example, Fraud Prevention and Anti-Bribery and Corruption. The BPS explains our individual ethical and legal responsibilities - and underscores our commitment to conducting business in a responsible and respectful manner. It forms the backbone of shared expectations for ViacomCBS employees, partners and suppliers across the globe. Formal training on the BPS will follow later this year.

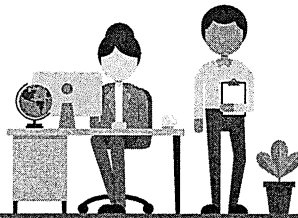
If you have a concern that our business standards are not being upheld, we encourage you to contact your manager, department head, HR representative or any of ViacomCBS' lawyers or Compliance Officers. If, however, you'd prefer to discuss your questions or concerns with someone outside of your location or team, one option is through [OPENLINE](#), ViacomCBS' reporting hotline. Calls to OPENLINE can be made 24 hours a day, 7 days a week and you may remain anonymous if you wish.

Sincerely,

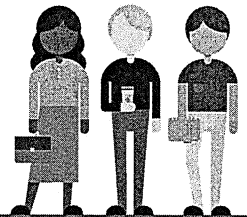
Henry T.A. Moniz
Chief Compliance Officer and Chief Audit Executive



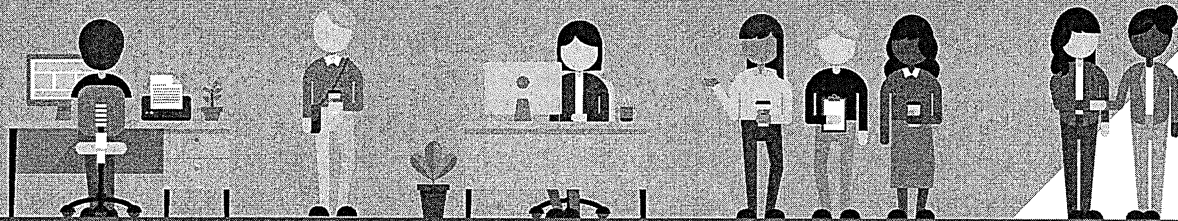
2020 VIACOMCBS



GLOBAL BUSINESS



PRACTICES STATEMENT



CREATING A GREAT

PLACE TO WORK

- ▶ How we can all help ensure a safe and inclusive work environment.



VALUING DIVERSITY & INCLUSION

HOW WE DO THE RIGHT THING

We embrace global diversity in all its forms and strive to maintain an inclusive environment and a culture that values all perspectives and backgrounds.

✓ WHY IT MATTERS

We are focused on creating an environment that supports all of our people, professionally and personally, to ensure that we can bring our best selves to work and drive creativity, innovation and results by connecting with the rich diversity of our employees, audiences and partners.

👁️ WHAT IT LOOKS LIKE IN OUR DAY-TO-DAY WORK

- Promoting equal engagement of all employees
- Ensuring that all employment decisions are based on individual merit and business needs, irrespective of race, religious creed, color, sexual orientation, national origin, gender, ancestry, physical or mental disability, age, sex, gender expression, gender identity, military and veteran status, marital status or any other personal characteristic protected by applicable law

- Extending this commitment to every aspect of our business and operations, from the programming and movies we create to employee benefits, programs, hiring and development
- Recognizing and respecting the value that diversity of people and ideas brings to the workplace, enabling us all to have a “place at the table” and realize our full potential
- Having people in leadership positions hold themselves accountable for creating, developing, promoting and championing a diverse, multicultural workforce and leading by example — all day, every day — in the way they behave and champion the principles of diversity and inclusion throughout ViacomCBS

🗨️ FREQUENTLY ASKED QUESTIONS

Q: What is diversity?

A: Diversity includes all the ways we are different. Age, gender and ethnicity are among some of the more visible signs of diversity. Less obvious aspects include work styles, sexual orientation or education.

Q: What is inclusion?

A: Inclusion is the state of being respected, valued and supported.

Q: Why are diversity and inclusion paired?

A: Diversity doesn't work without inclusion. Inclusion ensures that employees, in all the ways they are diverse, can connect and collaborate with each other and realize their potential in the workplace.

Q: How do I know if I am working in an inclusive work environment?

A: You should be able to agree with all of these statements:

- I am treated with respect
- My team values different views and perspectives
- My leader supports and drives an open and collaborative environment

PROMOTING A HARASSMENT-FREE WORKPLACE

HOW WE DO THE RIGHT THING

We are committed to providing a work environment free of offensive or unlawful harassment.

✓ WHY IT MATTERS

At ViacomCBS, we feel strongly that every employee should be treated with dignity and respect, regardless of their race, color, ethnicity, national origin, religion, creed, sex, sexual orientation, gender, gender identity, gender expression, age, marital status, disability, veteran status, citizenship status or any other personal characteristic protected by applicable law. We have zero tolerance for a hostile work environment.

We should never be subjected to harassment (sexual or otherwise), whether in the office or in any other work-related settings, including meetings, trips and social events. Harassment includes verbal, physical and visual conduct that creates an intimidating, abusive, offensive or hostile working environment which interferes with work performance. Every employee has the right to feel safe when working with co-workers, including managers, vendors, suppliers, clients, visitors or independent contractors.

👁️ WHAT IT LOOKS LIKE IN OUR DAY-TO-DAY WORK

- Being familiar with and adhering to ViacomCBS' Policy Against Harassment and this Statement's guidance on [Valuing Diversity & Inclusion](#)
- Never making inappropriate statements concerning a person's race, religious creed, color, sexual orientation, national origin, ancestry, physical or mental disability, age, sex, gender, gender expression, gender identity, military and veteran status, marital status or other legally protected personal characteristic, or inappropriate statements of a sexual nature, such as comments about an individual's body or appearance or intrusive personal questions or comments

(continued on next page)

🔍 EXAMPLES OF HARASSMENT

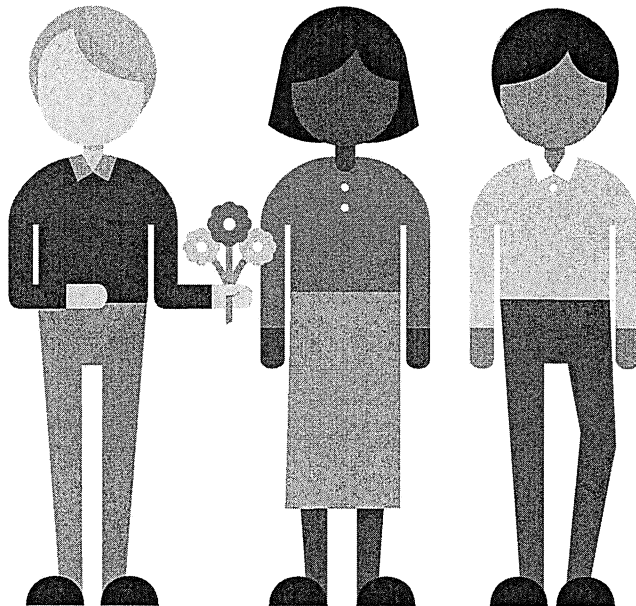
- Making degrading and disparaging comments, jokes or slurs related to race, color, age, gender, gender expression, sexual orientation and other categories protected by the laws that apply to us
- Displaying or storing written or graphic material that ridicules, insults or shows hostility toward a group or individual
- Distributing or storing pornographic, obscene or sexually suggestive content
- Asking for dates, or making unwelcome sexual advances, when it is clear — or becomes clear — that the overture is unwelcome
- Making unwelcome sexual requests while insinuating that access to or denial of job benefits is dependent upon compliance with the request
- Making inappropriate or threatening physical conduct, such as unwelcome touching or impeding or blocking another person's movements

PROMOTING A HARASSMENT-FREE WORKPLACE (CONT.)

👁️ WHAT IT LOOKS LIKE IN OUR DAY-TO-DAY WORK (CONT.)

- Conducting ourselves appropriately and remaining conscientious of how our actions and comments might be perceived or misunderstood by others
- Refusing to engage in any conduct of an overtly sexual nature, whether welcome or unwelcome
- Never displaying items, transmitting content or engaging in conduct that is sexually offensive, explicit or likely to offend our diverse workplace (for example, creating or sharing suggestive or offensive jokes, cartoons, letters, notes or invitations, whether by email, voicemail or other means)
- Adhering to ViacomCBS' guidance on harassment whenever utilizing social media
- Reporting instances of harassment to a manager or someone from your Human Resources, Legal or Compliance Department; and refusing to retaliate after an unwanted overture or inappropriate conduct is rejected, or in response to the reporting of such conduct

➔ [CLICK HERE FOR ADDITIONAL GUIDANCE ON DATING IN THE WORKPLACE](#)



ENSURING HEALTH & SAFETY IN THE WORKPLACE

HOW WE DO THE RIGHT THING

We are committed to maintaining a safe and healthy work environment for all employees, contractors, visitors and business partners. By delivering world-class health and safety measures across our multinational, multicultural and multi-disciplined work environments, we minimize health hazards and injuries to our employees, partners and audiences.

✓ WHY IT MATTERS

Feeling physically safe and secure at work is a prerequisite to being creative, innovative and successful. Health and safety regulatory requirements help ensure all employees will be able to come to work without fear of avoidable harm or injury. By being compliant with those regulations, we contribute positively to the Company's success and make ViacomCBS a workplace where everyone can feel comfortable and secure.

👁️ WHAT IT LOOKS LIKE IN OUR DAY-TO-DAY WORK

- Taking the initiative to prevent accidents and injuries
- Proactively reporting health and safety risks in the workplace
- Meeting or exceeding all regulatory requirements

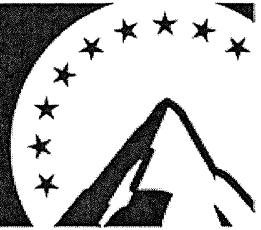
- Requiring our business partners, vendors and suppliers to operate their respective businesses in a safe and environmentally responsible manner
- Periodically assessing risks to health and safety in our daily work processes
- Conducting safety training for relevant audiences in a timely manner
- Recording and reporting accidents and incidents when they happen
- Encouraging managers and employees to work together to implement and maintain a safe work environment — managers should support and hold their teams accountable for complying with safety measures and best practices; employees should cooperate with their managers by adhering to these safety measures
- Encouraging an active safety culture, wherever you work

🔍 EXAMPLES OF HEALTH & SAFETY MEASURES

- Fire drills in NYC, earthquake drills in CA and tornado drills in our Nashville office
- Incident report submissions to our Risk Management team in the case of injury in the workplace
- Crisis management plans for all of our locations
- Safety Coordinator assessments on production sites
- Posting of health and safety laws in accessible areas
- Regular training for employees who operate machinery and/or electrical equipment so they can protect themselves, other people, property and the environment

For more information, contact Human Resources for guidance.

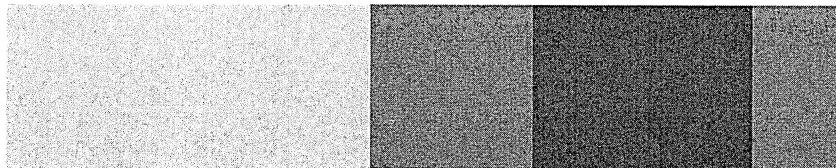
Paramount



December 13, 2021 memo from Bob Bakish, President and CEO, ViacomCBS (now Paramount Global), and relevant pages from the 2021 ViacomCBS Global Business Practices Statement

From: Office of Bob Bakish
Sent: Monday, December 13, 2021 3:26 PM
Subject: Our Code of Conduct: ViacomCBS' Global Business Conduct Statement (BCS)
Attachments: 2021 ViacomCBS Business Conduct Statement.pdf

**OFFICE OF
BOB BAKISH**
President & CEO



Team,

As we continue to grow and evolve our company, it remains important as ever that we hold ourselves accountable to doing business the right way, according to standards that reflect our core values.

These standards make up our Code of Conduct, otherwise known as the ViacomCBS Global Business Conduct Statement (BCS). The BCS describes our shared expectations for appropriate professional behavior, and our ethical and legal responsibilities as employees. Beyond detailing our company policies, the BCS is a key resource to help us navigate any number of sensitive and complex situations that may arise at work. Copies of the BCS in multiple languages can be found here, with an English-language version attached.

Our entire organization must adhere to the BCS, so to better familiarize yourself with its contents, we plan to launch mandatory online training starting in the new year for all employees. In the meantime, please take a moment to review the document, and contact our ViacomCBS Global Compliance team (GlobalCompliance@viacomcbs.com) with any questions.

Additionally, should you become aware of a possible ethics violation, we also ask that you please voice your concerns to either your manager, department head, HR Business Partner or any of ViacomCBS' Compliance Officers or lawyers.

For employees who would prefer to talk to someone outside their location or team, please contact OPENLINE at 855-833-5027 or [visit OPENLINE](#). Calls to OPENLINE can be made 24/7 and you may either choose to remain anonymous, or, if you're comfortable doing so, self-identify, as the Global Compliance team may want to follow up with you to gather more information, as needed. To that end, please know that reporting will be kept as confidential as possible and that we strongly prohibit any retaliation against those who do the right thing by speaking up.

Thank you for helping to make our ViacomCBS community better in all ways.

Best,
Bob

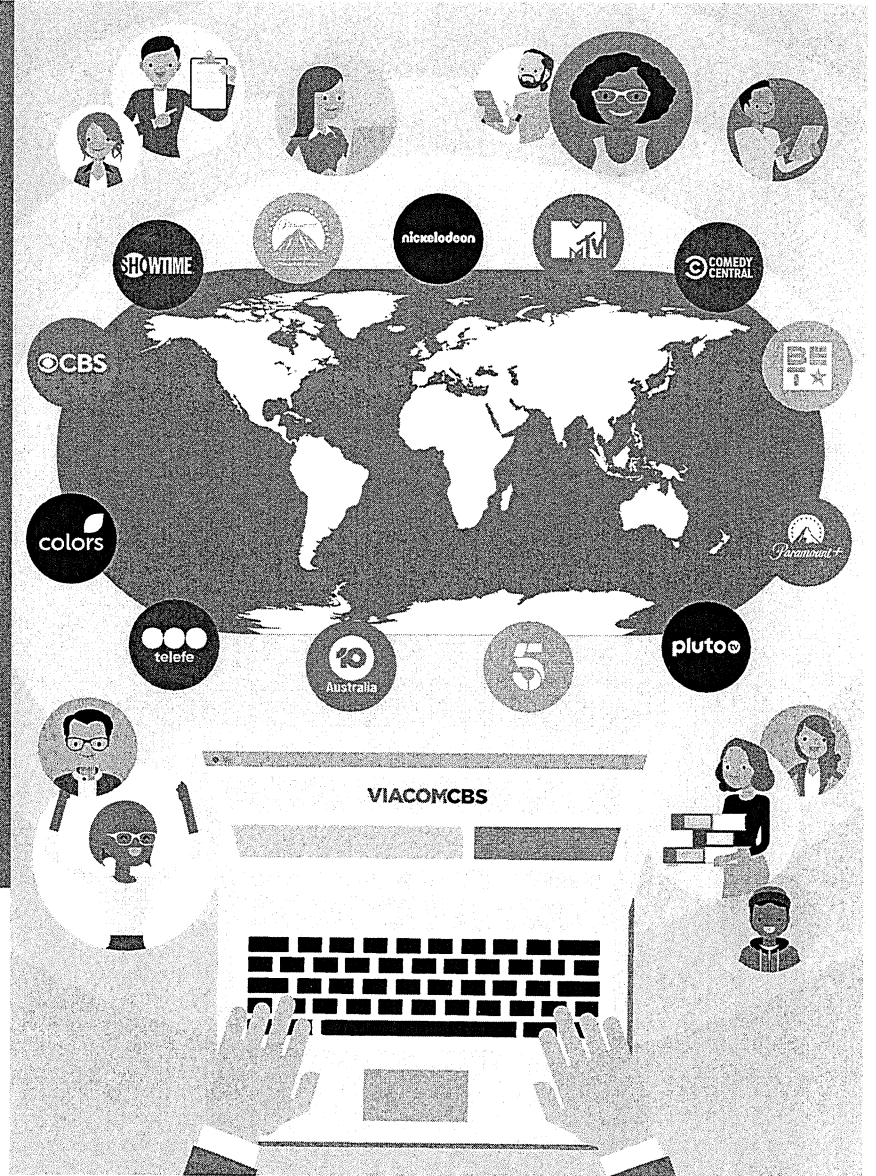
VIACOMCBS



BCS.ViacomCBS.com

Global Business Conduct Statement 2021

VIACOMCBS



Valuing diversity & inclusion

How we do the right thing

Diversity, inclusion, equity and belonging are priorities for ViacomCBS. We embrace global diversity in all its forms and champion an inclusive environment and a culture that values all perspectives and backgrounds.

Why it matters

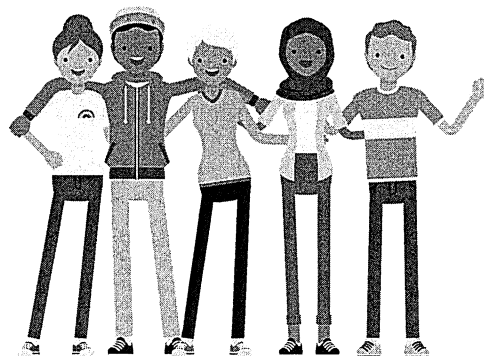
We are committed to making our company a place of inclusion that reflects, celebrates and elevates the diversity of our audiences. We are focused on creating an environment that supports all of our people, professionally and personally, to ensure that we can bring our best selves to work and drive creativity, innovation and results by connecting with the rich diversity of our employees, audiences and partners.

Further, contracting with diverse owned businesses as well as engaging Minority Business Enterprises and minority-owned financial institutions has a positive effect on our surrounding community. By engaging with these suppliers, we're helping to increase spend and consumption on the local level while enhancing the communities where our customers, consumers, and employees live and work. Moreover, when we utilize diverse suppliers it promotes competition in the supply chain and introduces us to new and innovative business solutions.

Additional Resources

[Office of Global Inclusion Resource Center](#)
[Employee Resource Group\(s\) New Member Sign-up](#)
[ViacomCBS Diversity & Inclusion Programs](#)
[ViacomCBS Supplier Diversity Website](#)

i For more information about Employee Resource Groups or a glossary of key terms, click here.



What it looks like in our day-to-day work

- Promoting equal engagement of all employees.
- Ensuring that all employment decisions are based on individual merit and business needs, irrespective of race, religion or creed, color, sexual orientation, national origin, ancestry, physical or mental disability, age, sex, gender, gender expression, gender identity, military and veteran status, marital status or any other personal characteristic protected by applicable law.
- Extending this commitment to every aspect of our business and operations, from the programming and movies we create to employee benefits, programs, hiring and development.
- Recognizing and respecting the value that diversity of people and ideas brings to the workplace, enabling us all to have a "place at the table" and realize our full potential.
- Having people in leadership positions hold themselves accountable for creating, developing, promoting and championing a diverse, multicultural workforce and supply chain and leading by example – all day, every day – in the way they behave and champion the principles of diversity and inclusion throughout ViacomCBS.

Valuing diversity & inclusion

Frequently asked questions

Q: What is diversity?

A: Diversity is the practice or quality of including or involving people from a range of different backgrounds, including but not limited to race and ethnicity, gender and gender identity, sexual orientation, socioeconomic status, language, culture, national origin, religious commitments, age, (dis)ability status and political perspective.

Q: What is inclusion?

A: Inclusion is the state of being respected, valued and supported.

Q: What are Employee Resource Groups and how do I join?

A: ViacomCBS Employee Resource Groups (ERGs) offer skills-building workshops, mentoring initiatives, business-focused panels, networking opportunities, community service projects and cultural/heritage month celebrations to further showcase ViacomCBS' commitment in building a culture of inclusion and belonging. To get involved in any of the ERGs, complete the membership form [here](#) or send an email to GlobalInclusion@ViacomCBS.com.

Q: What diversity and inclusion (D&I) Programs does ViacomCBS have?

A: ViacomCBS D&I Programs include the Nick Artist Program, Nick Writing Program, ViacomCBS Showcase, ViacomCBS Directing Initiative, ViacomCBS Writers Mentoring Program, Viewfinder Emerging Directors Program, and the ViacomCBS Supplier Diversity Program. Learn more about our D&I Programs [here](#).

Q: What is Supplier Diversity?

A: Supplier Diversity Programs involve an organization's efforts to include diverse categories of suppliers in its sourcing process and active supply base.

Q: What diverse categories are included in the Supplier Diversity Program?

A: To participate in ViacomCBS' Supplier Diversity Program, suppliers must hold either a valid minority-owned, women-owned or lesbian, gay, bisexual, transgender-owned, disability-owned, veteran-owned business certification or be self-certified through one of ViacomCBS' approved processes.

i For more information about supporting diversity and inclusion contact The Office of Global Inclusion. For any concerns about potential violations of this policy, please contact your Human Resources representative or the Employee Relations Team.

Promoting a harassment-free workplace

How we do the right thing

We are committed to providing a work environment free of offensive or unlawful harassment. ViacomCBS also believes in an environment that is free from workplace bullying and abusive conduct, regardless of whether the person is in a protected category.

Why it matters

At ViacomCBS, we feel strongly that every employee should be treated with dignity and respect, regardless of their race, color, ethnicity, national origin, religion, creed, sex, sexual orientation, gender, gender identity, gender expression, age, marital status, disability, veteran status, citizenship status or any other personal characteristic protected by applicable law. We have zero tolerance for a hostile work environment.

We should never be subjected to harassment (sexual or otherwise), whether in the office or in any other work-related settings, including meetings, trips and social events (in-person or virtual). Harassment includes verbal, physical and visual conduct that creates an intimidating, abusive, offensive or hostile working environment which interferes with work performance. Every employee has the right to feel safe when working with co-workers, including managers, vendors, suppliers, clients, visitors or independent contractors.

Examples of harassment:

- Making degrading and disparaging comments, jokes or slurs related to race, color, age, gender, gender expression, sexual orientation and other categories protected by the laws that apply to us.
- Displaying or storing written or graphic material that ridicules, insults or shows hostility toward a group or individual.
- Distributing or storing pornographic, obscene or sexually suggestive content.
- Asking for dates, or making unwelcome sexual advances, when it is clear — or becomes clear — that the overture is unwelcome.
- Making unwelcome sexual requests while insinuating that access to or denial of job benefits is dependent upon compliance with the request.
- Making inappropriate or threatening physical conduct, such as unwelcome touching or impeding or blocking another person's movements.
- Bullying or abusive conduct (regardless of whether the person is in a protected category) includes the repeated use of insults, derogatory remarks and epithets; threatening, intimidating or humiliating verbal or physical conduct; and the gratuitous sabotage of a person's work performance. A single act may not constitute bullying unless it is especially severe and egregious.

i For more information, review our Policy Against Harassment or contact your Human Resources representative or the Employee Relations Team.

What it looks like in our day-to-day work

- Being familiar with and adhering to **ViacomCBS' Policy Against Harassment** and this Statement's guidance on Valuing Diversity & Inclusion.
- Never making inappropriate statements concerning a person's race, religion or creed, color, sexual orientation, national origin, ancestry, physical or mental disability, age, sex, gender, gender expression, gender identity, military and veteran status, marital status or other legally protected personal characteristic, or inappropriate statements of a sexual nature, such as comments about an individual's body or appearance or intrusive personal questions or comments.
- Conducting ourselves appropriately and remaining conscious of how our actions and comments might be perceived or misunderstood by others.
- Refusing to engage in any conduct of an overtly sexual nature, whether welcome or unwelcome.
- Never displaying items, transmitting content or engaging in conduct that is sexually offensive, explicit or likely to offend our diverse workplace (for example, creating or sharing suggestive or offensive jokes, cartoons, letters, notes or invitations, whether by email, voicemail, social media or other means).
- Adhering to ViacomCBS' guidance on harassment whenever utilizing social media.
- Reporting instances of harassment to a manager or someone from your Human Resources, Employee Relations or Legal Department; and refusing to retaliate after an unwanted overture or inappropriate conduct is rejected, or in response to the reporting of such conduct.