



## DIGNITY AT WORK POLICY

### *Anti-Bullying, Harassment and Sexual Harassment Policy*

Synchronoss Technologies Inc., (“ Synchronoss” or the ”Company”) recognises the right of all employees to be treated with dignity and respect and is committed to ensuring that all employees are provided with a safe working environment which is free from all forms of bullying, sexual harassment and harassment.. Each and every employee has a duty to maintain a working environment in which the dignity of everyone is respect. Through enforcement of this policy and by education of employees, Synchronoss will seek to prevent, correct and discipline behaviour that violates this policy.

This policy applies to all persons involved in our operations, including coworkers, supervisors, managers, temporary or seasonal workers, agents, clients, vendors, customers, or any other third party interacting with the Company (“third parties”) and prohibits proscribed harassing conduct by any employee or third party of Synchronoss. An act of harassment may occur outside the work premises provided the perpetrator was acting in the course of employment. Our workplace is not limited to the Company’s facilities, but may also include client and vendor facilities, as well as anywhere a business-related function is taking place. If such harassment occurs or is directed toward an employee or a third party interacting with Synchronoss, the procedures in this policy should be followed.

Synchronoss will not tolerate harassment based upon protected characteristics (as defined below) or any other characteristic protected by applicable laws. Managers and supervisors who knowingly allow or tolerate harassment including the failure to immediately report such misconduct to their Human Resources Business Partner (“HR Business Partner”) or the Chief Compliance Officer (CCO), are in violation of this policy and subject to discipline.

Complaints by employees or other persons in the workplace of bullying or harassment at work will be treated with fairness, sensitivity, respect and (as far as possible) confidentiality for all parties concerned. Any person accused of bullying or harassment will be afforded a fair hearing and treated with respect and sensitivity.

In accordance with applicable law, we prohibit harassment by any employee, including supervisors and co-workers, against employees, applicants for employment, individuals providing services in the workplace pursuant to a contract, interns and volunteers based on their actual or perceived: race (including traits historically associated with race such as hair texture and protective hairstyles), religious creed, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status), sex and gender (including pregnancy, childbirth, lactation and related medical conditions), gender identity and gender expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender with which they identify), age, sexual orientation, Civil Air Patrol status, military and veteran status, membership with an organization identified with or seeking to promote the interests of a national origin group (collectively referred to as "protected characteristics") and any other consideration protected by applicable laws.

### ***Prohibited Harassment***

Synchronoss is committed to providing a work environment that is free of illicit harassment based on any protected characteristics.

For the purposes of this policy, prohibited harassment is any form of unwanted conduct related to any of the protected characteristics which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person. Many forms of behavior, including spoken words, gestures or the display/circulation of words, pictures or other material, may constitute harassment. A single incident may constitute harassment. The following list of examples is illustrative rather than exhaustive.

- (i) Verbal harassment – jokes, comments, ridicule or songs.
- (ii) Written harassment – including faxes, text messages, emails or notices.
- (iii) Physical harassment – jostling, shoving or any form of assault.
- (iv) Intimidatory harassment – gestures, posturing or threatening poses.
- (v) Visual displays such as posters, emblems or badges
- (vi) Excessive monitoring of work.
- (vii) Isolation or exclusion from social activities.
- (viii) Unreasonably changing a person's job content or targets.
- (ix) Pressure to behave in a manner that the employee thinks is inappropriate, for example being required to dress in a manner unsuited to a person's ethnic or religious background.
- (x) Harassment through social media.

### ***Sexual Harassment***

Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature. It is conduct which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person and it is prohibited under applicable domestic and international laws. A single incident may constitute sexual harassment.

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment also includes various forms of offensive behavior based on sex and may include gender-based harassment of a person of the same sex as the harasser. The following list of examples is illustrative rather than exhaustive. Unwanted sexual advances.

- Offering employment benefits in exchange for sexual favors.

- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct: leering; making sexual gestures; displaying sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages.
- Verbal conduct: making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about an employee's body or dress.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature; graphic verbal commentary about an individual's body; sexually degrading words to describe an individual; suggestive or obscene letters, notes or invitations.
- Physical conduct: touching, assault, impeding or blocking movements.
- Retaliation for reporting harassment or threatening to report sexual harassment.

An employee may be liable for harassment based on sex even if the alleged harassing conduct was not motivated by sexual desire. An employee who engages in unlawful harassment may be personally liable for harassment even if Synchronoss had no knowledge of such conduct.

### ***Bullying and Abusive Conduct***

Synchronoss defines “Bullying” as repeated mistreatment of one or more persons, usually taking place over a period of time. It includes, but is not limited to:

- Threatening, humiliating or intimidating behaviors.
- Work interference/sabotage that prevents work from getting done.
- Verbal abuse, including slander, ridiculing or maligning a person or his or her family, hurtful name-calling, insults, abusive or offensive remarks.
- Physical abuse, including pushing, kicking, tripping, shoving, poking, assault or threat of assault, or physical damage to a person’s work area. Cyberbullying, bullying which is carried out online, through mobile phones, social networking sites, email or texts.

Synchronoss does not tolerate any such behavior and such behavior is contrary to the environment of integrity and professionalism that Synchronoss is committed to providing to its employees. If you feel you have experienced bullying, you should express your concerns to your manager, your HR Business Partner, any member of SLT or the CCO.

### ***Prohibition Against Retaliation***

Synchronoss does not tolerate retaliation against any person by another employee, including supervisors, for using the Company’s complaint procedure, reporting proscribed harassment or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted internally or by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration

in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

### ***Confidentiality***

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The identity of the complainant may be revealed to the parties involved during the investigation, and adequate steps are taken to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or an investigation under this policy will be maintained in secure files within the GPS/Compliance department.

### ***Complaint Procedure***

Any employee who believes they have been harassed, or subjected to retaliation or abusive conduct in violation of the foregoing policies, or who is aware of such behavior against others, should immediately provide a written or verbal report to their supervisor, any member of the SLT, your Human Resources Business Partner, or the CCO.

Employees are not required to make a complaint directly to their immediate supervisor. Supervisors and managers who receive complaints of misconduct must immediately report such complaints to the CCO, who will attempt to resolve issues internally. When a report is received, Synchronoss will conduct a fair, timely, thorough and objective investigation that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. Synchronoss expects all employees to fully cooperate with any investigation conducted by the Company into a complaint of proscribed harassment, or retaliation, or regarding the alleged violation of any other Company policies. Synchronoss will maintain confidentiality surrounding the investigation to the extent possible and to the extent permitted under applicable laws

Upon completion of the investigation, the Company will communicate its conclusion as soon as practical. If the Company determines that this policy has been violated, remedial action will be taken, commensurate with the severity of the offense. Appropriate action will also be taken to deter any such conduct in the future.