



MCDONALD'S POLICY AGAINST DISCRIMINATION, HARASSMENT, AND RETALIATION

This policy applies to US McOpCo Restaurant employees, and US-paid McDonald's Corp and USA staff.

We are a people company. We care about you and the experience you have working here. This Policy describes our expectations for all employees, supervisors and managers as we work together to maintain a respectful workplace, free from discrimination, harassment and retaliation. McDonald's is committed to supporting this Policy because it is important to us that you work in a safe and respectful workplace.

Discrimination, Harassment, and Retaliation – Definitions and Application

What is discrimination?

We are committed to following the law and to making employment decisions for the right reasons. This means that hiring and firing decisions, pay, promotions, assignments and career development opportunities will be made based on your performance and the needs of the business, not on factors that are protected under the law. We will not make decisions based on sex, sex stereotyping, pregnancy (this includes pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), race, color, religion, ancestry or national origin, age, disability, medical condition, marital status, sexual orientation, gender, gender identity, gender expression, status of being transgender, military or veteran status, citizenship status, genetic information or any other protected group status as defined by law.

What is harassment?

All employees must treat each other with respect and take steps to ensure the work environment is free from harassment. Any harassing conduct that creates a hostile work environment for our employees will not be tolerated. This is also true of harassment based on factors like someone's gender, race, age, sexual orientation, disability status, citizenship status, military service or any other characteristics protected under the law.

This Policy covers a wide range of conduct – even if the conduct only offends some employees, but would be considered acceptable to other employees. Offensive words or actions can be in the form of sexually-suggestive comments; inappropriate jokes; teasing about a person's appearance or their age, race or sex; insults, unwanted nicknames or stereotyping based on the factors listed above; and the sharing of emails, texts, or pictures that are degrading, make someone uncomfortable or are insulting, even if the conduct is not sexual in nature.

What is sexual harassment?

We also will not tolerate sexual harassment. Sexual harassment includes unwelcome advances or flirtations, requests for sexual favors, and other conduct based on sex where agreeing to the conduct becomes a condition of employment, or when the conduct is used as the basis for an employment decision, or the conduct creates an intimidating, hostile or offensive work environment. Even if this conduct is not being used as a basis for an employment decision, it still may be unwelcome. Unwelcome sexual conduct is inappropriate and never acceptable at McDonald's.

Here are some examples of inappropriate behavior: touching any employee in a sexual manner; making comments about a person's body; intentionally brushing up against another person; staring at a person in a way that makes them feel uncomfortable; and sharing pictures, jokes, cartoons or any materials of a sexual nature. This Policy is also intended to cover more severe physical misconduct, such as sexual assault.

What is retaliation?

You will never be retaliated against for raising concerns or complaints regarding behavior if you believe that someone is engaging in conduct that potentially violates McDonald's Policy. The Company's Policy – and the law – does not allow any type of retaliation against someone who makes a complaint or participates in an investigation of a complaint. Retaliation means being punished or experiencing a negative employment action because you raised a concern or complaint of a potential Policy violation or participated in an investigation (examples might include experiencing a reduction in pay, hours or favorable work assignments).

When, Where, and to Whom does this Policy apply?

This Policy applies to all McDonald's employees – on McDonald's property, at a company-sponsored event, or offsite with other employees, contractors or vendors. Further, we do not tolerate harassment of employees by non-employees (for example, interns, temporary workers, independent contractors, franchisees, guests, customers, vendors and suppliers), and we do not tolerate harassment of non-employees by employees.

What if others around me make sexual jokes, and I am the only person who does not laugh and feels uncomfortable by the joke?

All employees are entitled to a workplace free from harassment. Jokes, teasing, and sharing pictures, emails, or videos that are sexual, degrading, or insulting in nature are frequently considered harassment, even if they are shared as a joke. This type of conduct is simply not OK in our workplace, and the Company supports employees who bring it to the attention of their managers, HR or other McDonald's resources described in more detail below.

A regular restaurant guest or employee of a vendor frequently flirts with me, but has never crossed the line into physical touching. It still makes me uncomfortable; is there anything I can do?

Yes, we want you to feel comfortable and safe at work, even if the offending behavior is done by someone who is not an employee of the Company. The Company encourages raising concerns or complaints regarding this type of conduct and supports employees' right to feel comfortable and safe at work.

What to Do When You Experience or Witness Discrimination, Harassment or Retaliation – Knowing When and How to Raise a Concern or Complaint

What do I do if I think this Policy has been violated?

If you experience or observe conduct like that described above, we need to hear from you! There are multiple individuals, both inside and outside of McDonald's, who will support you as soon as you make your complaint. While McDonald's will support you if you tell the person who is making you feel uncomfortable to stop, you are not required to, because we recognize that doing so is not always easy or possible. Regardless of whether you confront the person about the conduct, we want you to reach out to one of the McDonald's resources listed below to ensure that any offensive conduct stops and appropriate action is taken. When you let us know that discrimination, harassment or retaliation may have occurred, we will ensure that the appropriate steps are taken as outlined in this Policy, and will support you through the process. Raising concerns or complaints regarding conduct that may violate this Policy – even if you're not sure whether it violates it or not – will help McDonald's ensure a safe and respectful workplace. Working together to eliminate any offensive or uncomfortable behavior is crucial to maintaining a positive working environment for you and all of our employees.

What if I think I might have been subjected to discrimination, harassment, or retaliation, but I'm not sure?

We want you to feel comfortable and safe at work. We encourage and support you contacting one of the available resources to discuss your concern. We are here to support you through that process and assist you with any behavior you believe may violate this Policy.

We also encourage employees to raise concerns or complaints not only about themselves, but any possible violations of our Policy they observe. Raising concerns regarding possible violations you observe will help ensure we have a work environment free from discrimination, harassment and retaliation.

Are Supervisors and Managers required to escalate concerns or complaints of potential Policy violations?

If you supervise or manage people, you must set a positive example by ensuring your conduct, including your employment decisions and workplace behaviors are free from discrimination and harassment. You are also required to immediately notify McDonald's if you are aware of any conduct that could violate this Policy. It is also all Supervisors' and Managers' responsibility to take steps to eliminate all discrimination, harassment and retaliation. This includes immediately contacting one of the McDonald's resources listed below in any situation where you become aware of any conduct that potentially violates this Policy or if an employee provides you with information that they are uncomfortable because of another person's conduct.

Who can I report concerns or complaints to?

There are individuals inside and outside of McDonald's to support you throughout the entire process of making a complaint.

The following McDonald's resources are available to you to raise concerns of potential Policy violations:

For Restaurant Employees:

- Your restaurant's General Manager or Ops consultant
- HR Consultant or HR manager for your restaurant
- HR Consulting
- Business Integrity

For Corporate Staff:

- Your people manager, or your people manager's manager
- Any member of the Center HR team
- HR Consulting
- Business integrity

Note, you do not have to discuss issues with your manager before raising a concern or complaint to someone else. You can go to whichever resource you are most comfortable with.

Of course, depending on the severity of the conduct, and any physical safety issues you may experience, you may also want to reach out to third parties such as local law enforcement, or one of McDonald's third party Employee Assistance Programs ("EAPs") such as the McResource Line and the Employee Resource Connection. These EAPs are free and confidential and can help support you during many different kinds of situations. The services provided by the EAPs include counseling, referrals and other support services that may be helpful. Please contact HR Consulting at 877-623-1955 and you will be given contact and other information about McDonald's Employee Assistance Programs. HR Consulting is available 24 hours a day/7 days a week. In addition, McDonald's resources can also provide assistance to you in contacting local law enforcement.

In some states, our Policy also provides additional information and resources in a separate state-specific attachment.

What if I feel my safety is threatened?

The McDonald's resources mentioned above will do all they can to ensure your safety. While the facts of each situation may be different, there might be a need for a temporary change to the schedule and/or reporting relationship to make sure you feel safe and comfortable. As mentioned above, depending on the circumstances and the severity of the conduct involved, you may also want to reach out to third parties such as local law enforcement, which you may do on your own or with the assistance of the above resources. Your safety is of the highest importance to the Company.

The Process After a Complaint is Made

What happens once I raise a concern?

We encourage you to contact the McDonald's resources listed above regarding possible violations of this Policy. These resources will help you with any concerns you have regarding any potential violations of this Policy. Complaints will be taken seriously and investigated thoroughly and fairly. This means that a neutral person will conduct the investigation. That person may be someone within McDonald's or an outside third party investigator, depending on the circumstances. The neutral person will talk to you, possible witnesses and the person who allegedly engaged in the misconduct. While the investigation is taking place, we will take appropriate steps to ensure your safety in the workplace. Those steps are dependent on the circumstances, and may include a temporary reassignment or leave, immediate directions to others to cease certain behaviors and training.

After the investigation of your complaint is completed and any appropriate steps are taken, you can still provide information about any other situation that makes you feel uncomfortable. Also, if you feel like you are being punished or treated poorly after you made a complaint, you should reach out to HR immediately.

If at any time you have questions about the process or the status of an investigation, please reach out to HR. You will also be updated and notified once the investigation has been concluded.

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If the person accused of discrimination, harassment or retaliation has questions or concerns regarding the process, they should reach out to HR, but should not discuss the issues with the complainant or other employees.

What happens if I tell someone about a possible Policy Violation? Will I experience retaliation?

Employees who provide information about conduct they believe may violate this Policy will not be retaliated against in any way. This protection against retaliation also covers those who provide information in an investigation of alleged Policy violations raised by someone else. All employees have a duty to cooperate in investigations or otherwise respond to questions regarding alleged harassment. This Policy expressly prohibits retaliation against those who raise potential violations and those who participate in investigations into potential violations.

Complaints will be taken seriously and investigated thoroughly, impartially, and in a timely manner. The identity of individuals who raise concerns regarding harassment, alleged victims, witnesses and alleged harassers, along with information obtained as part of an investigation, will be kept confidential to the extent possible and permitted by law.

What happens after an investigation?

If our investigation confirms that this Policy has been violated or that inappropriate conduct has occurred, the Company will take immediate corrective action that is proportionate to the violation. Corrective action can come in any form, including termination, reassignment to another job or location, changes in reporting relationships, written warning, training, coaching, counseling and/or other measures that the Company deems appropriate under the circumstances.

After the investigation of your complaint is completed, if you have any continuing concerns or wish to provide additional information about your first complaint or any other situation that makes you feel uncomfortable, please reach out to HR or the resources listed above. Also, if you feel like you are being retaliated against, punished, or treated poorly after you made a complaint, you should reach out to one of the available resources immediately. Your concerns will be reviewed and appropriate action will be taken.

We are a people company. We care about you and the experience you have working here. We have resources to assist you. We are all in this together, and we are stronger and better when we work together to keep McDonald's a respectful, safe, and inclusive work environment.