



POLICY AGAINST HARASSMENT, SEXUAL HARASSMENT AND RETALIATION

The Greenbrier Companies, Inc. (“Greenbrier” or “the Company”) is committed to maintaining a workplace environment where every employee is treated with dignity and respect and feels safe in the performance of their job. This requires more than just obeying the law; it requires that all employees conduct themselves in a mature and appropriate way in performing every aspect of their jobs. Accordingly, Greenbrier strictly prohibits harassment against employees, applicants for employment, or individuals providing services in the workplace pursuant to a contract (including interns, volunteers, consultants, contractors, temporary workers, customers and suppliers) based on their actual or perceived race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex (including pregnancy, childbirth, lactation and related medical conditions), gender, gender identity, gender expression, age, sexual orientation, military, veteran or Civil Air Patrol status, or any other characteristic protected under applicable federal, state, or local law. All such harassment is prohibited.

The Company will not tolerate discrimination or harassment based upon these characteristics or any other characteristic protected by applicable federal, state or local law. The Company also does not retaliate or otherwise discriminate against applicants or employees who request a reasonable accommodation for reasons related to disability or religion.

This policy applies to all persons involved in our operations, including coworkers, supervisors, managers, temporary workers, agents, clients, vendors, customers, or any other third party interacting with the Company (“third parties”) and prohibits harassing conduct by any employee or third party of Greenbrier, including non-supervisory employees, supervisors and managers. This policy extends outside of the workplace to other work-related settings, such as client sites, social functions (such as holiday dinners, picnics, sporting events, etc.), and business functions (such as conventions, trade shows, meetings, etc.).

Harassment Defined

“Harassment” is any unwelcome verbal, physical, or visual conduct based on any protected characteristic that creates an intimidating, offensive, or hostile working environment, or that interferes with an employee’s work performance. Such conduct constitutes unlawful harassment when

- submission to the conduct is made either an explicit or implicit condition of employment; or
- submission to, or rejection of, the conduct is used as the basis for an employment decision affecting the individual; or

- such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creates an intimidating, hostile, or offensive work environment.

Sexual Harassment

You should be especially aware of the prohibition against sexual harassment, which is particularly onerous and commonplace in our society. Sexual harassment includes various forms of offensive behavior based on sex, and includes gender-based harassment of a person of the same sex as the harasser. The following is a partial list of actions that are considered sexual harassment:

- Unwanted sexual advances
- Offering employment benefits in exchange for sexual favors or making propositions, verbal or otherwise
- Making or threatening reprisals after a negative response to sexual advances, such as threatening, influencing or negatively affecting the employment, job status, salary or performance of another employee because of his or her refusal of unwanted sexual advances, flirtations or invitations
- Visual conduct: leering; making sexual gestures; displaying sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages, or other materials (including any company equipment, such as computer screensavers and apps on phones)
- Verbal conduct: making or using derogatory comments, epithets, slurs, sexually explicit jokes, or suggestive or degrading comments about an employee's body, dress, or appearance, negative stereotyping, obscene or vulgar language
- 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, deliberately obstructing 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 the Company had no knowledge of such conduct. In addition, an aggregation of a series of incidents can constitute sexual harassment even if one of the incidents considered on its own would not be harassing.

Employees are encouraged to discuss any questions regarding this policy with their direct supervisor or Human Resources.

Other Types of Harassment

Conduct does not have to be sexually based to be harassment. Other types of harassing conduct includes the following:

- Verbal conduct, including threats, epithets, derogatory comments or slurs based on an individual's protected classification;
- Visual conduct, including derogatory posters, photographs, cartoons, drawings or gestures based on protected classification; and
- Physical conduct, including assault, unwanted touching or blocking normal movement because of an individual's protected classification.

Prevention of Abusive Conduct

It is expected that the Company and persons in the workplace perform their jobs productively as assigned, and in a manner that meets all of managements' expectations, during working times, and that they refrain from any malicious, patently offensive or abusive conduct, including but not limited to conduct that a reasonable person would find offensive based on any of the protected characteristics described above. Examples of abusive conduct include repeated infliction of verbal abuse, such as the use of malicious, derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the intentional sabotage or undermining of a person's work performance.

Non-disclosure/Non-disparagement Agreements and Time Limitations in Oregon

In Oregon, state law prohibits an employer from requiring or coercing an employee to enter into a non-disclosure agreement or non-disparagement agreement related to allegations of employment discrimination, retaliation or sexual assault (these agreements would limit an employee's ability to talk about allegations of that kind). However, if an Oregon employee voluntarily requests such a provision, Greenbrier may agree to such a provision to help maintain confidentiality. In that event, Greenbrier will provide the employee with seven days to revoke that agreement after signing it. Under the law, Oregon employees have up to five years to bring a claim for discrimination or harassment.

Reporting and Complaint Procedures

Any employee who believes that he or she has been subjected to conduct in violation of this policy, or who is aware of such behavior against others, must immediately provide a written or verbal report to the head of Human Resources of the respective business unit, the EthicsPoint hotline (1-866-295-2647), the Chief Human Resources Officer (503-670-3148) or the Legal Department. Employees are not required to make a complaint directly to their immediate manager or supervisor, but all employees are encouraged to document any incidents involving discrimination, harassment, and sexual assault as soon as possible. Managers and supervisors who receive complaints of misconduct must immediately report such complaints to a Human Resources representative, the Chief Human Resources Officer or the Chief Legal and Compliance Officer (503-598-3893), who will attempt to resolve issues internally. Any manager or supervisor who

fails to report conduct that violates this policy may also be subject to discipline, up to and including termination of employment.

Complaints of harassment prohibited by this policy should be as detailed as possible. When a report is received, the Company will conduct a fair, timely, thorough and objective investigation that provides all parties appropriate due process and that reaches reasonable conclusions based on the evidence collected. The Company expects all employees to fully cooperate with any investigation conducted by the Company into a complaint of prohibited harassment, discrimination or retaliation, or regarding the alleged violation of any other Company policies. The Company will maintain confidentiality surrounding the investigation to the extent possible and to the extent permitted under applicable federal and state law.

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, up to and including termination of employment. Appropriate action will also be taken to deter any such conduct in the future.

Discipline

Employees who violate this policy are subject to appropriate discipline, up to and including termination of employment.

Supervisors and managers are responsible for keeping employees informed of this policy, and must take immediate action if they observe or become aware of any form of policy violation taking place. Any supervisor or manager who fails to report conduct that violates this policy in accordance with applicable reporting procedures may also be subject to discipline, up to and including termination of employment.

Retaliation

Retaliation is prohibited against any person by another employee or by Greenbrier for using the Company's complaint procedure, reporting prohibited discrimination or harassment or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted 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. Retaliation may also include any on-duty or off-duty conduct that could discourage an employee from making a complaint, or from testifying, assisting with, or participating in an investigation, proceeding, or hearing regarding the same.

Greenbrier will not retaliate against any employee or other person for making a good-faith complaint of harassment, or for participating or cooperating in an investigation relating to harassment under this policy. If you believe you have been retaliated against, or that you have witnessed retaliation in violation of this policy, you should contact an appropriate Company representative as listed in the Complaint Procedure

section above so that Greenbrier can conduct an investigation and take appropriate remedial action consistent with this policy.

Your Responsibilities

It is critical for all employees to remember that any conduct that interferes with an employee’s ability to do his or her job, including harassing conduct, is detrimental to every one of us and to our business as a whole. Thus, Greenbrier is committed to maintaining a respectful workplace that does not include any instances of prohibited harassment, and it relies on you to ensure that this policy is followed and that you do your part to avoid, prevent, and eradicate behavior that violates this policy. If you experience or witness any instances of prohibited harassment, it is your responsibility to report it in accordance with this policy.

This policy supersedes all previously adopted harassment and retaliation policies and applies to Greenbrier and all of its subsidiaries.

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