

WORKPLACE SEXUAL HARASSMENT, ANTI-HARASSMENT AND BULLYING POLICY

Cambridge Trust Company (“Cambridge Trust” or “the Company”) is committed to maintaining a work environment in which all employees are treated fairly and with respect, dignity and decency, and in accordance with all applicable law. Through enforcement of this policy and by education of employees, the Company strives to prevent inappropriate conduct that could be considered sexual harassment, other harassment or bullying. In addition, the Company is committed to correcting any inappropriate conduct and to disciplining those who violate this policy.

A copy of the entire policy will be provided to each employee at the time of hire and to all employees on an annual basis. This section is intended to provide a summary of the policy.

The law and the policies of Cambridge Trust prohibit disparate treatment on the basis of sex and any other protected characteristic, with regard to terms, conditions, privileges and perquisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to complement and further those policies, not to form the basis of an exception to them.

Cambridge Trust expressly prohibits any form of workplace harassment based on race, color, religion, gender, national origin, ancestry, age, disability, genetic information, pregnancy, veteran’s status, military service, marital status, sexual orientation, gender identity or expression, or any other protected category. Improper interference with the ability of Cambridge Trust’s employees to perform their job duties may result in discipline up to and including discharge.

All employees, regardless of position, are covered by, and are expected to comply with, this policy and to take appropriate measures to ensure that prohibited conduct does not occur. This policy covers other individuals who have a relationship with the Company and may include customers, independent contractors, vendors, consultants, Board members, and visitors.

While this policy sets forth the Company’s goals of promoting a workplace that is free of sexual harassment, harassment, or bullying it is not designed or intended to limit the Company’s authority to discipline or take remedial action for workplace conduct which it deems unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment, harassment, or bullying presented here. That is, the Company will take immediate and proportionate corrective action when it determines that inappropriate conduct has occurred that, left unchecked, may lead to further incidents.

This policy applies to all work-related settings and activities, both inside and outside the workplace, and includes work-related functions and outside of work where the workplace could reasonably be said to be affected. This policy extends to employee activity on social networking websites such as Instagram, Facebook, Twitter, and LinkedIn. This policy also extends to the Company’s property, including but not limited to its telephones, copy machines, facsimile machines, and computers and computer applications, such as e-mail and internet access, which may not be used to engage in conduct that violates this policy.

Mistreatment on social media carries the weight of any other workplace interaction. The Company urges supervisors and managers to be wary of their social media connections with employees. The Company reminds all employees to be responsible and appropriate in their social media when it can affect workplace interactions.

It is against this policy to engage in harassment based on gender, including offensive conduct that is sexual in nature. Any hostile conduct based on gender is forbidden by this policy regardless of whether the individual engaged in harassment and the individual being harassed are of the same or different genders. This policy extends to harassing conduct, which may not be sexual in nature, but is based on an individual's gender or sexual orientation or identification.

Sexual Harassment

Unwelcome sexual advances, requests for sexual favors and other verbal, nonverbal, visual or physical conduct of a sexual nature may constitute sexual harassment when:

- 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.

Examples of sexual harassment prohibited by this policy include, but are not limited to, the following:

- Unwelcome sexual flirtations, advances, demands, pressures, propositions or requests for sexual acts or favors.
- Offering employment benefits, such as favorable performance reviews, salary increases, promotions, increased benefits, or continued employment, in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Offensive physical contact such as unwanted patting, grabbing, pinching, brushing against another's body, or impeding or blocking movement.
- Offensive visual conduct, including leering, making sexual gestures, the display of offensive sexually-suggestive objects or pictures, cartoons or posters.
- Offensively suggestive or obscene letters, notes or invitations.
- Offensive sexually-oriented verbal comments, name-calling, whistling, epithets, slurs, teasing or jokes.
- Continued or repeated verbal abuse of a sexual nature.

- Graphic, degrading, or other sexual comments, mockery, ridicule, insults or put-downs.
- Texting, sending picture messages, or otherwise communicating inappropriately via cell phones, smartphones, over the internet, using social media, and the like.

Harassment

It is the goal of Cambridge Trust to promote a workplace that is free of harassment. Harassment is a form of employee misconduct that is demeaning to another person and undermines the integrity of the employment relationship.

Engaging in physical, visual, electronic, verbal and nonverbal conduct, to include actions, writings, or comments which may be based on an individual's race, color, religion, gender, national origin, age, disability, ancestry, genetic information, veteran status, military service, marital status, sexual orientation, gender identity, or any other protected category, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to employees may constitute harassment.

While it is not always easy to identify precisely what conduct constitutes harassment, prohibited conduct includes but is not limited to slurs, epithets, derogatory remarks or comments, threats, hostile physical conduct, intimidating acts, unwelcome jokes, teasing, display or circulation of offensive printed, visual or electronic materials, or other similar conduct that implicates one of the protected categories. It also extends to unwelcome voice-mail messages, e-mail, graphics, downloaded material, and websites involving one of the protected categories. This can include conduct via texting, sending picture messages, or otherwise communicating inappropriately via cell phones, smartphones, over the internet, using social media, and the like.

Bullying

Cambridge Trust will not tolerate bullying behavior. Employees found in violation of this policy will be disciplined, up to and including termination.

Cambridge Trust defines bullying as repeated inappropriate behavior, either direct or indirect, whether verbal, non-verbal, visual physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment. Such behavior violates the Company's commitment to a work environment where employees are treated with dignity, decency and respect.

Bullying may be intentional or unintentional. However, it must be noted that when an allegation of bullying is made, the intent of the alleged bully is irrelevant, and will not be given consideration when meting out discipline. As in sexual harassment, it is the effect of the behavior on the individual that is important. Some examples of bullying behavior include but are not limited to:

- Verbal bullying: Slandering, ridiculing or maligning a person or his or her family; name calling; insults; using a person as butt of jokes; abusive and offensive remarks; public humiliation; gossip and rumors; shouting or raising voice at an individual.
- Physical bullying: Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property.
- Gesture bullying: Nonverbal threatening gestures; glances that can convey threatening messages.
- Exclusion: Socially or physically excluding or disregarding a person in work-related activities; ignoring or interrupting.

In addition, the following examples may constitute or contribute to evidence of bullying in the workplace:

- Not allowing the person to speak or express him or herself (i.e., ignoring or interrupting).
- Manipulating the ability of someone to do his or her work (e.g., overloading, under loading, withholding information, assigning meaningless tasks, setting deadlines that cannot be met, giving deliberately ambiguous instructions).
- Inflicting menial tasks not in keeping with the normal responsibilities of the job.
- Taking credit for another person's ideas.
- Refusing reasonable requests for leave in the absence of work-related reasons not to grant leave.
- Deliberately excluding an individual or isolating him or her from work-related activities, such as meetings.

Reporting an Incident

Employees who believe they have been subjected to sexual harassment, harassment or bullying are encouraged to directly inform the offending person(s) that such conduct is offensive and must stop, if they are comfortable in so doing. If, however, the employee does not wish to communicate directly with the alleged offender, or if direct communication has been ineffective, then that employee is encouraged and expected to utilize the process below. That is, any employee who believes that he or she has been subjected to sexual harassment, harassment or bullying is encouraged and expected to come forward to complain. This may be done in writing or verbally.

This reporting system applies to those individuals who have *observed, heard of, or experienced* sexual harassment, harassment or bullying.

Employees may report potential violations of this policy to Pilar Pueyo by phone (617) 520-5541 or via e-mail at pilar.pueyo@cambridgetrust.com. She is also available to discuss any concerns employees may have and to provide information about the policy and complaint process. Complaints may also be submitted to our anonymous whistleblower hotline by phone at (844)420-0044 or via e-mail at reports@lighthouse-services.com.

Managers Duty to Report

Any supervisor or person in a management position who has witnessed, heard, heard of, or otherwise been made aware of conduct that is or may be inconsistent with this policy or who receives a report of conduct, from any source whatsoever, that is inconsistent with this policy *must* report the matter immediately to Pilar Pueyo by phone (617) 520-5541 or via e-mail at pilar.pueyo@cambridgetrust.com or to our anonymous whistleblower hotline by phone at (844)420-0044 or via e-mail at reports@lighthouse-services.com.

False and malicious complaints (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of disciplinary action.

Investigation

Upon receipt of a complaint, the Company will designate a person(s) to promptly investigate the allegation(s) in a prompt, thorough and impartial manner.

The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. The investigation will include a private interview with the person filing the complaint, the person claiming to experience the misconduct (if different), and with witnesses. The person alleged to have engaged in the inappropriate behavior will also be interviewed. All employees are required to cooperate in any internal investigation. At the conclusion of the investigation, to the extent appropriate, the Company will inform the person who felt harassed or bullied and the person alleged to have committed the conduct of the results of that investigation. Any report or other writings that are generated in the course of the investigation are the Company's property and will not be shared with those who have been interviewed as part of the investigation.

Corrective/Remedial Action

If it is determined that inappropriate conduct has occurred, the Company will act promptly to stop it and, where appropriate, impose any corrective and/or remedial action. The corrective action may range from counseling to termination from employment, and may include such other forms of disciplinary action as the Company deems appropriate under the circumstances. Remedial action, such as training or re-training, may be in order as well. Corrective action taken will be proportionate to the offensiveness of the conduct.

Retaliation

All employees should take special note that retaliation against an individual who has complained about harassment, sexual harassment or bullying, and retaliation against individuals for cooperating with an investigation of a complaint will not be tolerated by this Company.

That is, no hardship, loss of benefit or adverse employment action may be imposed on an employee for complaining about or filing a good-faith complaint. Further, employees may not

be harmed in any way for cooperating with or otherwise participating in the investigation of a complaint. Retaliation is a serious violation of this policy and should be reported immediately.

If an employee believes that retaliation has occurred against any individual, then the employee is encouraged to immediately report it through the means described above under "Reporting An Incident." Anyone who is found to have retaliated against an employee for complaining about, or reporting potential harassment, sexual harassment, or bullying, or for cooperating or otherwise participating in an investigation, will be subject to discipline, up to and including termination of employment.