Equal Employment_Affirmative Action

Equal Employment/Affirmative Action

Classification:	Policy	**Supersedes:**	April 2014
Issued:	October 2014	**Reviewed:**	October 10, 2014

PURPOSE
This policy states the Company's position on equal opportunity and affirmative action in the workplace.

APPLICABILITY
This policy applies to all current or potential employees of Integrys Energy Group, Inc. and its subsidiaries (Company).

In case any aspect of this policy conflicts with a federal, state, or local law or regulation or with an agreement with represented employees, that law, regulation, or agreement will prevail, without negating the rest of this policy.

POLICY STATEMENT
The Company is committed to high ethical standards and maintaining a work environment characterized by respect for all. In alignment with the Company's values and expectations all employment decisions including, but not limited to, recruiting, selection, training and development, compensation, promotions, transfers, disciplinary actions, terminations, and other privileges and conditions of employment, will be made without regard to an individual's race, color, religion, sex, national origin, age, sexual orientation, gender identity, genetic information, status as an individual with a disability, status as a protected veteran, or any other protected classification. All hiring and selection decisions will be made based on the individual's qualifications for a particular job and on an equal employment opportunity basis.

To this end, the Chief Executive Officer has published an EEO/Affirmative Action Policy Statement. All executives, managers, and others with responsibilities affecting or relating to employment opportunities including, but not limited to, human resources personnel and supervisors, are responsible for administering this policy within their respective areas and should take immediate and appropriate action if discriminatory practices or behaviors are reported.

GUIDELINES

- The Company is committed to complying with all federal, state, and local laws pertaining to equal employment opportunities and will treat all applicants and employees equally and without regard to any protected characteristic.
- The Company will continue to take affirmative action to recruit, employ, and advance in employment qualified women, minorities, protected veterans, and individuals with disabilities. The Company is committed to establishing goals in its Affirmative Action Plan for underutilized groups.
- Employees are encouraged to discuss any issues that relate to equal employment with their leaders or an HR Business Partner so that they can be resolved proactively.
- The Company encourages all employees to voluntarily self-identify with respect to the following characteristics in order to allow the Company to most effectively comply with its Affirmative Action Plan: gender, race/ethnicity, status as an individual with a disability, and protected veteran status.
- The Company will not retaliate against any employee who identifies a potential violation of this policy nor will it tolerate any harassment or retaliation against any current or potential employee for identifying a potential violation of this policy.

SUPPORTING DOCUMENTS

In support of this policy, the following must be referenced:

- Integrys Energy Group Code of Conduct

REFERRAL

The Human Resources Department is responsible for this policy. Contact an HR Business Partner, the HR Help Line at 801-8888 or 1-888-427-3164 (press 2 for HR), or the Vice President and Chief Human Resources Officer if you have any questions about this policy.

Harassment-Free Workplace

Harassment-Free Workplace

Classification:	Policy	**Supersedes:**	August 2013
Issued:	October 2014	**Reviewed:**	April 8, 2015

PURPOSE

This policy prohibits employees from engaging in harassing behaviors and requires employees to report such behaviors.

APPLICABILITY

This policy applies to all employees of Integrys Energy Group, Inc. and its subsidiaries (Company).

In case any aspect of this policy conflicts with a federal, state, or local law or regulation or with an agreement with represented employees, that law, regulation, or agreement will prevail, without negating the rest of this policy. In particular, this policy does not apply to employees exercising their rights under Section 7 of the National Labor Relations Act.

The Company is committed to providing a workplace free of harassment, especially when based on race, color, religion, sex, national origin, age, sexual orientation, gender identity, genetic information, status as an individual with a disability, status as a protected veteran, or other protected classification.

The Company needs to know about any harassment so it can take appropriate action.

The Company strongly disapproves of and will not tolerate any form of harassment of its employees, once notified.

The Company will not retaliate or tolerate retaliation against any individual for:

- Reporting, in good faith, a claim of harassment.
- Cooperating in the investigation of a complaint conducted by the Company or a governmental agency.
- Opposing, in good faith, any act or practice that violates any applicable law or this policy.

Employees who violate this policy may be subject to corrective action, up to and including termination.

Consistent with Company values, leaders who violate this policy are held to a higher standard as agents of the Company.

REQUIREMENTS

- Employees are strictly prohibited from engaging in harassing behaviors.
- Under this policy, harassment is any conduct that insults, shows hostility towards, or makes fun of an individual or group because of their race, color, religion, sex, national origin, age, sexual orientation, genetic information, disability, veteran's status, or other protected classes.
- Harassment also includes sexual harassment, which is any unwelcome sexual advance or request for sexual favors or any conduct of a sexual nature when:
    - Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment,
    - Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or
    - Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.
- Sexual harassment includes, but is not limited to:
    - Unwelcome sexual advances,
    - Requests for sexual favors,
    - Requests for sexual favors as a condition of employment,
    - Unwelcome or offensive touching or grabbing,
    - Verbal and non-verbal conduct (such as sexual jokes, suggestive or obscene comments, and suggestive gestures),
    - Written or graphic materials in paper or electronic form (such as sexually suggestive or obscene documents, pictures, cartoons, or photos), or
    - Any other conduct of a sexual nature, whether written, verbal, or physical.
- Employees are also strictly prohibited from engaging in any other types of harassing behavior that create a hostile work environment or impact any condition of employment. These actions include, but are not limited to:
    - Epithets, slurs, gestures, or derogatory remarks, whether communicated verbally, electronically, or in writing (including published material) aimed at individuals or group,
    - Practical jokes intended to demean, embarrass, or ostracize others,
    - Hostile or intimidating acts, such as demeaning pranks, mocking, or stalking someone, or

- Organized, persistent attempts to exclude individuals from work-related activities, resources, or information.

- Employees are strictly prohibited from using Company communication tools (e.g., phones, e-mail, internet, computers) to search for, create, send, or store offensive material.

Duty to Report

Employees who believe they have been subjected to or witnessed a harassing act committed by anyone must immediately report the harassing behaviors to any business leader, union leader, union representative, HR Business Partner, Ethics Contact, or Ethics Line (**1-888-317-8062 or www.integrysgroup.com/ethicsline**). While the Company encourages employees to report concerns to their leader, HR Business Partner, or to other internal parties, employees always have the ability to make reports to governmental agencies or third parties with appropriate jurisdiction.

A leader receiving any information that an employee has been subjected to violation of this policy must immediately contact an HR Business Partner. Employee reports of violations of this policy must be investigated.

To the extent possible and consistent with the Company's obligation to conduct a thorough investigation and take appropriate corrective action, any complaints of harassment will be treated as confidential.

MONITORING

As stated in the Requirements section, employees are required to report harassing behaviors.

To ensure each complaint of harassment is promptly and accurately documented and investigated:

- All complaints of harassment will be forwarded to Human Resources for prompt investigation. If the report was verbal, it should be documented in writing prior to forwarding to Human Resources.

- After an investigation, employees who have filed a complaint acknowledged by Human Resources will be contacted and informed of the investigation closure.

- Employees who do not believe that their complaint has been satisfactorily resolved can appeal to the head of their business unit, to the Vice President and Chief Human Resources Officer, or any of the ethics contacts as referenced in the Integrys Energy Group Code of Conduct.

- For specific statutory requirements for resolution outside of the Company see Attachment A.

SUPPORTING DOCUMENTS

In support of this policy, the following must be referenced:

- Integrys Energy Group Code of Conduct

REFERRAL

The Human Resources Department is responsible for this policy. Contact an HR Business Partner or the Assistant Vice President – Client & Workforce Relations if you have questions about this policy.

ATTACHMENT A

The purpose of this policy is to establish thorough and effective procedures for responding to incidents and complaints of harassment so that problems can be identified and remedied within the Company, and to provide notice to employees of their right to contact their state agency or the Equal Employment Opportunity Commission (EEOC) to file complaints.

Specifically, if an employee chooses to file a complaint with the Illinois Department of Human Rights (IDHR), the employee must do so within 180 days of the alleged incident(s). The IDHR will begin an investigative process to determine whether sufficient evidence exists to file a claim in court. The decision of the IDHR may be appealed to the Illinois Human Rights Commission.

A complaint with the EEOC must be filed within 300 days of the alleged incident(s). The EEOC will investigate the incident to determine whether a violation of a federal law has occurred.

However, where the employer has an effective sexual harassment policy in place and the complaining employee fails to take advantage of that policy and allow the employer an opportunity to address the problem, the employee may lose the right to pursue his or her claim against the employer.

Contact information:

Illinois Department of Human Rights
Chicago: 312-814-6200 or 800-662-3942
Springfield: 217-785-5100
Marion: 618-993-7463

Illinois Human Rights Commission
Chicago: 312-814-4760
Springfield: 217-785-4350

United States Equal Employment Opportunity Commission
800-669-4000

Job Accommodations

Job Accommodations under the Americans with Disabilities Act (ADA)

Classification:	Policy	**Supersedes:**	February 2008
Issued:	February 2008	**Reviewed:**	October 10, 2014

PURPOSE

This policy outlines the Company's approach to evaluating those who may need job accommodations under the ADA, as amended, or other applicable laws.

APPLICABILITY

This policy applies to all current or potential employees of Integrys Energy Group, Inc. and its subsidiaries (Company).

In case any aspect of this policy conflicts with a federal, state, or local law or regulation or with an agreement with represented employees, that law, regulation, or agreement will prevail, without negating the rest of this policy.

The Company is committed to providing current and potential employees with reasonable accommodations to ensure that qualified individuals with disabilities have rights and privileges in employment equal to those of individuals without disabilities. The Company will not discriminate against individuals with a disability who, with or without reasonable accommodation, can perform the functions of their jobs.

The Company will not retaliate against any employee who requests a job accommodation nor will it tolerate any retaliation against any current or potential employee for requesting a job accommodation.

The Company will comply with all applicable federal and state laws.

REQUIREMENTS

- Employees are responsible for requesting a job accommodation. However, if the Company believes an accommodation may be needed, it may begin a review of an employee's medical condition without a prior request from the employee.
- Employees can make a job accommodation request by contacting their leader or an HR Business Partner.
- Employees may initially verbally request a job accommodation, but employees must also complete a Job Accommodation Request Form. This form begins the documentation process required for a prudent evaluation of a job accommodation request.

MONITORING

- To better understand an employee's accommodation request, the Company may require job-related medical information. In appropriate cases, the Company may also ask an employee to complete a job-related medical exam by a Company-selected medical professional, which will be done at the Company's expense.
- All medical information is to be treated confidentially on a "need to know" basis, in accordance with federal and state laws and regulations. An appropriate Release of Information form must be signed by the employee to obtain medical records or information from a third party.

- Appropriate laws and the Company's compensation and/or benefit plans will govern any adjustments to an employee's compensation or benefits that result from the job accommodation process.
- The Company will make the final decision regarding any reasonable accommodation it can make to an employee's or job applicant's request.

Upon learning that an employee has requested or may need an accommodation, the HR Business Partner, in consultation with the leader and/or Legal and Governance Affairs, will engage in an interactive process with the employee to:

- Determine the nature of the request,
- Gather pertinent medical information as it relates to the function of the employee's job,
- Seek medical evaluation on the employee's request, if needed,
- Determine the reasonableness of the accommodation request, and
- Communicate with the employee regarding the resolution of the request.

SUPPORTING DOCUMENTS

In support of this policy, the following must be referenced:

- WEC Energy Group Code of Business Conduct
- Employee Information, Recordkeeping, and Privacy Guideline and Procedure
- Job Accommodation Request Form

REFERRAL

The Human Resources Department is responsible for this policy. Contact an HR Business Partner or the HR Help Line at 801-8888 or 1-888-427-316 (press 2 for HR) if you have questions about this policy.