

# Inclusive Workplace Policy of Gaming and Leisure Properties, Inc.

Effective on November 1, 2020

## **PURPOSE**

Gaming and Leisure Properties, Inc. (“GLPI”) does not discriminate in any way based on sex, sexual orientation, gender identity, or gender expression. This policy is designed to create a safe and productive workplace environment for all employees.

This policy sets forth guidelines to address the needs of transgender and gender non-conforming employees and clarifies how the law should be implemented in situations where questions may arise about how to protect the legal rights or safety of such employees. This policy does not anticipate every situation that might occur with respect to transgender or gender non-conforming employees, and the needs of each transgender or gender non-conforming employee must be assessed on a case-by-case basis. In all cases, the goal is to ensure the safety, comfort, and healthy development of transgender or gender non-conforming employees while maximizing the employee’s workplace integration and minimizing stigmatization of the employee.

## **DEFINITIONS**

The definitions provided here are not intended to label employees but rather to assist in understanding this policy and the legal obligations of employers. Employees may or may not use these terms to describe themselves.

- Gender identity: A person’s internal, deeply felt sense of being male, female, or something other or in-between, regardless of the sex they were assigned at birth. Everyone has a gender identity.
- Gender expression: An individual’s characteristics and behaviors (such as appearance, dress, mannerisms, speech patterns, and social interactions) that may be perceived as masculine or feminine.
- Transgender: An umbrella term that can be used to describe people whose gender identify and/or expression is different from their sex assigned at birth.
  - A person whose sex assigned at birth was female but who identifies as male is a transgender man (also known as a female-to-male transgender person, or FTM)
  - A person whose sex assigned at birth was male but who identifies as female is a transgender woman (also known as a male-to-female transgender person, or MTF)
  - Some people described by this definition don’t consider themselves transgender – they may use other words or may identify simply as a man or woman. A person does not need to identify as transgender for an employer’s nondiscrimination policies to apply to them.
- Gender non-conforming: This term describes people who have, or are perceived to have, gender characteristics and/or behaviors that do not conform to traditional or societal expectations. Keep in mind that these expectations can vary across cultures and have changed over time.
- Transition: The process of changing one’s gender from the sex assigned at birth to one’s gender identity. There are many ways to transition. For some people, it is a complex process that takes

place over a long period of time, while for others it is a one or two-step process that happens more quickly. Transition may include “coming out” (telling family, friends and coworkers); changing the name and/or sex on legal documents; and, for many transgender people, accessing medical treatment such as hormones and surgery.

- Sexual orientation: A person’s physical or emotional attraction to people of the same and/or other gender. Straight, gay, and bisexual are some ways to describe sexual orientation. It is important to note that sexual orientation is distinct from gender identity and expression. Transgender people can be gay, lesbian, bisexual or straight, just like non-transgender people.
- LGBTQ+: A common abbreviation that refers to the lesbian, gay, bisexual and transgender community.

## **PRIVACY**

Transgender employees have the right to discuss their gender identity or expression openly, or to keep that information private. The transgender employee gets to decide when, with whom, and how much to share their private information. Information about an employee’s transgender status (such as the sex they were assigned at birth) can constitute confidential medical information under privacy laws like HIPAA.

Management, Human Resources staff, or coworkers should not disclose information that may reveal an employee’s transgender status or gender non-conforming presentation to others unless doing so is required or advisable in order to perform the individual’s job function in accordance with this policy, a specific directive from your supervisor or the law. That kind of personal or confidential information may only be shared with the transgender employee’s consent and with coworkers who truly need to know to do their jobs.

## **OFFICIAL RECORDS**

GLPI will change an employee’s official record to reflect a change in name or gender upon request from the employee. Certain types of records, like those relating to payroll, may require a legal name change before the person’s name can be changed. Most records, however, can be changed to reflect a person’s preferred name without proof of a legal name change.

A transgender employee has the right to be addressed by the name and pronoun corresponding to the employee’s gender identity. Official records will also be changed to reflect the employee’s new name and gender upon the employee’s request.

As quickly as practicable, we will make every effort to update any photographs at the transitioning employee’s workplace, so the transitioning employee’s gender identity and expression are represented accurately.

If a new or transitioning employee has questions about company records or ID documents, the employee should contact their local Human Resources Department.

## **NAMES/PRONOUNS**

An employee has the right to be addressed by the name and pronoun that correspond to the employee’s gender identity, upon request. A court-ordered name or gender change is not required. Intentional or persistent refusal to respect an employee’s gender identity (for example, intentionally referring to the employee by a name or pronoun that does not correspond to the employee’s gender identity) by any employee is not permissible and may result in disciplinary action. If you are unsure what pronoun a transitioning coworker might prefer, you can politely ask your coworker how they would like to be addressed.

## **TRANSITIONING ON THE JOB**

Employees who transition on the job can expect the support of management and human resources staff. HR will work with each transitioning employee individually to ensure a successful workplace transition.

## **RESTROOM ACCESSIBILITY**

Employees shall have access to the restroom corresponding to their gender identity. Any employee who has a need or desire for increased privacy, regardless of the underlying reason, will be provided access to a single-stall restroom, when available. No employee, however, shall be required to use such a restroom. All employees have a right to safe and appropriate restroom facilities, including the right to use a restroom that corresponds to the employee's gender identity, regardless of the employee's sex assigned at birth. That is, transgender women must be permitted to use the women's restroom, and transgender men must be permitted to use the men's restroom. That decision should be left to the transgender employee to determine the most appropriate and safest option for them. Some employees – transgender or non-transgender – may desire additional privacy. Where practicable, GLPI will make available a unisex single-stall restroom that can be used by any employee who has a need for increased privacy, regardless of the underlying reason. For example, if any employee does not want to share a multi-person restroom with a transgender coworker, they can make use of this kind of option, if available.

## **LOCKER ROOM ACCESSIBILITY**

All employees have the right to use the locker room that corresponds to their gender identity. Any employee who has a need or desire for increased privacy, regardless of the underlying reason, can be provided with a reasonable alternative changing area such as the use of a private area, or using the locker room that corresponds to their gender identity before or after other employees. Any alternative arrangement for a transgender employee will be provided in a way that allows the employee to keep their transgender status confidential.

## **DRESS CODES/UNIFORMS**

Our company does not have dress codes that restrict employees' clothing or appearance based on gender. Transgender and gender non-conforming employees have the right to comply with company dress codes in a manner consistent with their gender identity or gender expression.

## **DISCRIMINATION/HARASSMENT**

It violates company policy to discriminate in any way (including, but not limited to, failure to hire, failure to promote, or unlawful termination) against an employee because of the employee's actual or perceived gender identity. Additionally, it also violates company policy to retaliate against any person objecting to, or supporting enforcement of legal protections against, gender identity discrimination in employment.

GLPI is committed to creating a safe work environment for transgender and gender non-conforming employees. Any incident of discrimination, harassment, or violence based on gender identity or expression will be given immediate and effective attention, including, but not limited to, investigating the incident, taking suitable corrective action, and providing employees and staff with appropriate resources.