

EMPLOYMENT POLICIES

EQUAL EMPLOYMENT OPPORTUNITY

Equinox is an equal opportunity employer. Equal employment has been and continues to be both policy and practice at Equinox. We recruit, hire, train, promote, and base all other employment decisions without regard to actual or perceived race, creed, religion, color, age, sex, or gender (including pregnancy, childbirth, related medical conditions and lactation), sexual orientation, gender identity or gender expression (including transgender status), national origin, ancestry, citizenship status, marital status, medical condition as defined by applicable state or local law, physical or mental disability, military service and veteran status, genetic information, or any other characteristic protected by applicable federal, state, or local laws and ordinances (referred to as **“protected characteristics”**). Discrimination on the basis of protected characteristics is prohibited under federal law (including Title VII of the Civil Rights Act of 1964) and/or applicable state or local law.

Disability discrimination is prohibited under the Americans with Disabilities Act, and applicable state or local law, including, but not limited to: (1) prohibitions on discrimination against a qualified individual with a disability in regard to job application procedures and hiring; and (2) prohibitions on denying employment opportunities to an employment applicant or employee who is a qualified individual with a disability based on the need to make reasonable accommodations to the physical or mental impairments of the employee or applicant for employment absent undue hardship.

If you have questions or concerns about equal employment opportunities in the workplace, you should bring these issues to the attention of your manager or the People & Culture Department, or utilize the Reporting Procedures outlined in the Discrimination, Harassment, and Retaliation Prevention & Protection of Minors policy, below.

THE IMMIGRATION REFORM ACT AND CONTROL ACT 1986

Equinox is committed to employing only U.S. Citizens and resident aliens who are authorized to work in the United States. In accordance with the Immigration Reform Act & Control Act of 1986, each employee, as a condition of employment, must complete the Employment Eligibility Verification Form (I-9) and present valid documentation establishing identity and employment eligibility within three (3) business days of commencing employment. Employees with questions or seeking more information on immigration law issues are encouraged to contact the People & Culture Department.

OPEN DOOR POLICY

Equinox is always looking for ways to improve our employee and member experience and some of our best ideas come from employees sharing their ideas and concerns. Employees are encouraged to ask questions and share their suggestions, ideas, and concerns with their managers.

REASONABLE ACCOMMODATION

Equinox will endeavor to make reasonable accommodations for qualified applicants and employees

with known physical or mental limitations absent undue hardship. This includes reasonable accommodations for known physical or mental limitations related to the pregnancy, childbirth or related medical conditions, or the sincerely held religious beliefs and practices of an employee, consistent with applicable law. Examples of reasonable accommodations may include modification of job functions and providing equipment or other assistance. This list is illustrative and by no means represents an exhaustive list of all potentially reasonable accommodations.

To ensure consistency and timeliness, Equinox Leave Management Concierge, administers our reasonable accommodations process. Employees requesting an accommodation must **contact Equinox Leave Management directly at 800.441.8955**, and their People & Culture representative.

DISCRIMINATION, HARASSMENT, AND RETALIATION PREVENTION & PROTECTION OF MINORS

Equinox is committed to maintaining a workplace free from discrimination, harassment, and retaliation, including on the basis of any actual or perceived protected characteristics. Such discrimination, harassment, or retaliation is unacceptable in the workplace and in any work-related setting such as a business trip or Equinox-sponsored social function. Equinox does not tolerate, and expressly prohibits, such conduct, regardless of whether it is engaged in by, or targeted towards, our job applicants, contractors, interns, volunteers, employees, managers, vendors, customers, members, guests, or any third party. Equinox also prohibits retaliation as defined below.

In addition to being a violation of this policy, discrimination, harassment, or retaliation based on any actual or perceived protected characteristic as defined by applicable federal, state, or local laws and ordinances is also unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted, or testified in an investigation or proceeding involving a complaint of sexual harassment as defined by applicable federal, state, or local laws and ordinances, is unlawful.

Discrimination Defined. Discrimination under this policy means treating an employee less favorably than similarly-situated employees because of a protected characteristic.

Harassment Defined. Harassment under this policy means unwelcome verbal, visual, or physical conduct that denigrates or shows hostility or aversion towards an individual, or which creates an intimidating, hostile, or offensive working environment that interferes with work performance, based on a protected characteristic.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures, or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or e-mails) or physical conduct (including physically threatening another individual, blocking someone's way, making a threatening gesture, looking at someone in a threatening or lewd manner, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state, or local laws and ordinances. Employees are expected to behave at all times in a manner consistent with the intended purpose of this policy, regardless of whether a specific action is listed here or not.

Sexual Harassment Defined. Sexual harassment can include all of the above actions, as well as other

unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal, visual, or physical conduct of a sexual nature when:

- Submission to that conduct or those advances or requests is made either explicitly or implicitly a term or condition of an individual's employment; or
- Submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or
- The conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

While impossible to list all conduct that would violate this policy, the following are examples of prohibited behavior that will result in disciplinary action, up to and including termination:

- unwelcome sexual or romantic advances, flirtations, leering, whistling, touching, pinching, assault, blocking normal movement
- requests for sexual favors or demands for sexual favors in exchange for favorable treatment
- making or threatening reprisals after a negative response to sexual advances
- obscene or vulgar gestures, posters, or comments
- sexual jokes or comments about a person's body or sexual prowess, inclinations, or deficiencies
- propositions, or suggestive or insulting comments of a sexual nature
- derogatory cartoons, posters, drawings, or other images
- sexually-explicit e-mails, voicemails, images, or other communications (including communications via social media like Facebook, Instagram, Snapchat, X, TikTok, etc.)
- uninvited touching (or touching without consent) of a sexual nature
- unwelcome sexually-related comments
- conversation about one's own or someone else's sex life
- conduct or comments consistently targeted at only one gender, even if the content is not sexual
- teasing or other conduct directed toward a person because of the person's gender

The above list is illustrative and by no means represents an exhaustive list of conduct or types of conduct that violate this policy. Offensive and inappropriate behavior does not need to rise to the level

of sexual harassment within the law to be considered a violation of this policy.

Retaliation Defined. Retaliation means adverse conduct taken because an individual requested an accommodation, reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or sought relief or action under this policy, or otherwise participated in the reporting and investigation process described below. “Adverse conduct” includes but is not limited to: any action that would discourage or keep an individual from reporting discrimination, harassment or retaliation, or seeking relief or action under this policy; shunning and/or avoiding an individual who reports harassment, discrimination or retaliation, or who seeks relief or action under this policy; express or implied threats or intimidation intended to prevent an individual from reporting harassment, discrimination or retaliation, or from seeking relief or action under this policy; and denying employment benefits because an applicant or employee reported harassment, discrimination or retaliation, sought relief or action under this policy, or participated in the reporting and investigation of discrimination, harassment or retaliation.

Protection of Minors. As you may be aware, minors are sometimes present at Equinox. “Minors” is defined as anyone under the age of 18.

Equinox is committed to providing a safe environment for all minors who are in our clubs or participating in Equinox-sponsored functions or activities. Equinox maintains a strict policy prohibiting any sort of “abuse of a minor,” including but not limited to the following:

- **Physical Abuse:** Violent non-accidental contact which results in injury. This includes, but is not limited to, striking, biting, or shaking. Injuries include bruises, fractures, cuts, and burns.
- **Sexual Abuse:** Any form of sexual activity with a minor, whether at Equinox, at home, or any other setting.
- **Emotional Abuse:** A pattern of intentional conduct which crushes a minor’s spirit or attacks their self-worth through rejection, threats, terrorizing, isolating, or belittling.

The above list is illustrative and by no means represents an exclusive list of conduct or types of conduct that violate this policy. Conduct described above as discrimination, harassment, or sexual harassment, when directed at a minor, is also strictly prohibited by this policy and will result in disciplinary action, up to and including termination. In addition, entering the Kid’s Club without legitimate Equinox business and/or without the proper credentials to do so shall be a violation of this policy.

Employees who violate this policy will be subject to discipline, up to and including termination of employment, and may be subject to possible criminal prosecution.

Reporting Procedures. If you believe you have been subjected to prohibited discrimination, harassment, or retaliation in violation of the Equal Employment Opportunity Policy and/or this Discrimination, Harassment and Retaliation Prevention & Protection of Minors Policy, or if you witness conduct that you believe violates these policies, including conduct that you believe constitutes abuse of a minor, you are expected to report it immediately to your manager or to the Regional People &

Culture representative responsible for your club or corporate office location. If either of the aforementioned individuals is the subject of the complaint, you should contact any higher-level manager in your reporting chain. In addition, employees may report complaints (anonymously if they wish) 24 hours a day, 7 days a week via the Ethics Hotline at 1.877.217.6362.

Your report should be as detailed as possible and include a description of the incident, the names of individuals involved, the names of any witnesses to the incident, direct quotes (when language is relevant) and any documentary evidence (e.g., texts, emails, notes, pictures, etc.) regarding the incident, and any other information you may have that may be relevant to your report.

Any employee or manager who learns of an employee, member or guest concern about conduct in violation of this policy—whether through a formal or informal complaint, overhearing a conversation, or through some other means, whether they believe the concern to be meritorious or not, and whether the complaining employee asks them to report it or not— must immediately report the concern(s) raised to the applicable People & Culture representative (and, if related to a club, to that club's General Manager). Failure to comply with this duty to report may result in discipline, up to and including termination.

All potential signs of abuse of a minor—whether the abuse is suspected to be occurring on or off Equinox premises—must be reported. Any employee who witnesses, observes, is told about, or suspects any abuse of a minor must immediately report that to their direct manager or Regional People & Culture representative, or call the National Abuse Hotline 1-800-96-ABUSE (1-800-962-2873).

Remember, we cannot remedy claimed discrimination, harassment, retaliation, or abuse of a minor, unless you bring these claims to the attention of management. Please report any conduct which you believe violates this policy.

Investigation Procedures. Upon receiving a complaint, Equinox will promptly conduct a fair and thorough investigation into the facts and circumstances of any claim of a violation of the Equal Employment Opportunity Policy and/or this Discrimination, Harassment and Retaliation Prevention & Protection of Minors Policy. Equinox may also choose to take interim measures to ensure safety of employees and to preserve the integrity of the investigation. Such interim measures may include placing employees on paid/unpaid leave pending investigation. Upon request by Equinox, employees are expected to cooperate fully in any and all investigations conducted pursuant to this policy, and a failure to do so may result in disciplinary action, up to and including termination. Equinox will endeavor to keep the reporting employee's identity, and the identities of participating witnesses, confidential. However, complete confidentiality may not be possible in all circumstances.

During the investigation, Equinox generally will interview the complainant and the accused, conduct further interviews as necessary, and review any relevant documents or other information. Upon completion of the investigation, Equinox will reasonably evaluate the evidence and information gathered, and take corrective measures, in its discretion, as necessary and/or appropriate. Such corrective measures may include, but are not limited to, coaching/counseling, verbal or written warnings, or immediate termination. Anyone, regardless of position or title, whom Equinox determines has engaged in conduct that violates the Equal Employment Opportunity Policy and/or this

Discrimination, Harassment and Retaliation Prevention & Protection of Minors Policy will be subject to corrective measures, up to and including termination. This includes individuals engaging in discrimination, harassment or retaliation, or abuse of minors, as well as managers who fail to report violations of this policy, or knowingly allow prohibited conduct to continue.

The complainant and the subject will be informed when an investigation has concluded and, where practicable, the outcome/resolution.

No Retaliation. Equinox prohibits retaliation against any employee for using this complaint procedure or for filing, testifying, assisting or participating in any manner in any investigation, proceeding, or hearing conducted by a governmental enforcement agency.

Other Workplace Investigations. In addition to the investigations described above for violations of the Equal Employment Opportunity Policy and/or the Discrimination, Harassment and Retaliation Prevention & Protection of Minors Policy, Equinox may from time to time conduct internal investigations into other issues, including, without limitation, fraud, theft, violations of other Equinox policies and procedures, and the like. Equinox may also choose to take interim measures to ensure safety amongst employees and to preserve the integrity of the investigation. Such interim measures may include placing employees on paid/unpaid leave pending investigation.

Employees are expected to cooperate fully with all such internal investigations, and a failure to do so may result in disciplinary action, up to and including termination. Equinox will endeavor to keep the reporting employee's concerns confidential. However, complete confidentiality may not be possible in all circumstances. Nothing in this policy is meant to limit any employee's right to engage in protected concerted activity.

Upon completion of the investigation, Equinox will reasonably evaluate the evidence and information gathered, and take corrective measures, in its discretion, as necessary and/or appropriate. Such corrective measures may include, but are not limited to, coaching/counseling, verbal or written warnings, or immediate termination.

No Retaliation. Equinox complies with all applicable laws. If at any time, you believe that any employee has engaged in any type of fraud or other violation of the law, please report it to your direct manager or your People & Culture representative. If either of the aforementioned individuals is the person toward whom the complaint is directed, you should contact any higher-level manager in your reporting chain. In addition, employees may report complaints 24 hours a day, 7 days a week via the Ethics Hotline at 1.877.217.6362. Employees who report in good faith under this policy or who cooperate with investigations that arise from such reporting will not be subject to any retaliation.