

Human Rights, Health & Safety, Anti-Corruption and Responsible Lobbying Policy Statement

Policy Area	Policy Statement
Grievance Mechanisms	Neuberger Berman is committed to ethical conduct and provides multiple confidential reporting channels (telephone, email, postal mail, and secure anonymous reporting) to raise concerns regarding corporate integrity, with strict non-retaliation protections for good-faith reports and confidentiality subject to limited legal exceptions. Employees are encouraged to raise any concerns regarding workplace conditions, including those relating to discrimination, harassment, workplace conditions or safety, to the Human Capital Management department or any manager. Employees are advised of procedures for raising any such concerns during onboarding and through regular training (no less than annual) and the policies are posted internally and shared no less than annually. For NBEL employees, the process for submitting grievance is outlined in the policy. Employees and applicants are protected from coercion, intimidation, interference or discrimination as a result of reporting breaches or assisting in an investigation. Investigations are handled as discretely and timely as practicable and appropriate corrective action is taken whenever breaches of these policies are determined to have occurred.
Health and Safety Fundamentals	Neuberger Berman is committed to providing a safe and healthy working environment in compliance with applicable law and firm policy, including appropriate risk assessment, safety arrangements, and prompt reporting and investigation of incidents.
Violence and Harassment Protections	Neuberger Berman prohibits workplace violence, harassment, bullying, and unlawful discrimination in all work contexts, and provides confidential reporting channels with non-retaliation protections.
Commitment to Respect Human Rights	Neuberger Berman is committed to respecting internationally recognized human rights across its operations and, where relevant, investment activities, supported by appropriate due-diligence, grievance, and non-retaliation mechanisms. Such rights include: freedom of association and collective dialogue, fair and non-discriminatory employment practices, and safe and healthy working conditions.

Anti-Bribery and Anti-Corruption	The Firm's Global Anti-Corruption Policy and Procedures sets forth rules governing certain gifts and entertainment and imposes pre-approval or reporting requirements. Furthermore, many public, as well as private, institutions have their own internal rules regarding the acceptance of gifts or entertainment by their personnel and other representatives. Neuberger Berman personnel are reminded to be aware that many of the institutions with whom they deal have certain additional restrictions.
Responsible Lobbying and Political Engagement	Due to the potential for conflicts of interest, the Firm has established policies and procedures relating to political activities that are designed to comply with applicable federal, state and local law. Each employee who is a U.S. citizen or green card holder is required to obtain preapproval for all political contributions and other political activities, including political contributions and other political activities of the employee's spouse, domestic partner, dependent children, or any other person that the employee materially supports. To the extent that employees of the firm, or any external party retained by the firm, engage in any activity that constitutes lobbying activity under federal, state, or local law, such lobbying activity must be approved by the firm's Legal and Compliance Department and must comport with all applicable laws and regulations.
Personal Data Protection	Please see our Privacy Policy .

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