

CLAYCO AND AFFILIATES - HARASSMENT-FREE WORKPLACE POLICY

It is the policy of Clayco Inc. and its affiliates (the “Company”) to provide a work environment that is free of any unlawful discrimination, including harassment that is based on any legally protected status. The Company believes in respecting the dignity of every employee and expects every employee to show respect for all of our employees, customers and suppliers. This policy forbids any unwelcome conduct that is based on an individual’s race, color, religion, sex, age, national origin, ancestry, disability, sexual orientation, marital status, military status, genetic information, or any other protected status. This policy forbids any employee, manager, supervisor, officer, customer or supplier to harass any employee, applicant, or contractor as prohibited by federal, state or local laws and as further prohibited by the Company.

Prohibited Conduct

Harassment can take many forms. The conduct prohibited by this policy, whether verbal, physical, or visual, includes any unwelcome conduct that is inflicted on someone because of that individual’s protected status. Among the types of unwelcome conduct prohibited by this policy are: epithets, slurs, jokes, pranks or negative stereotyping; threatening or intimidating acts; unwanted physical contact; obscene or harassing telephone calls, texts, instant messages, e-mails, letters, notes or other forms of communication; the circulation or posting of written or graphic materials that show hostility toward individuals as it relates to their protected status; and any conduct that may create a hostile work environment. This policy forbids, and the company will not tolerate, harassment regardless of whether it rises to the level of a legal violation and will take appropriate disciplinary action (up to and including termination) against any employee who violates this policy.

The Company also prohibits general and visual harassment, including derogatory words, electronic communications (including emails, instant messages and texts), written or graphic material that is placed on walls, bulletin boards or elsewhere on the premises or that is circulated in the workplace that shows hostility or aversion towards any race, color, religion, sex, age, national

origin, veteran status, marital status, familial status or disability, or any other legally protected status.

Sexual Harassment

Sexual harassment is an issue that deserves special mention and is not tolerated by the Company. Harassing conduct based on gender often is sexual in nature but sometimes is not. This policy forbids harassment based on gender regardless of whether the offensive conduct is sexual in nature. Any unwelcome conduct based on gender is also forbidden by this policy regardless of whether the individual engaged in harassment and the individual being harassed are of the same or are of different genders.

Unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct based on sex constitute unlawful sexual harassment when (1) submission to such conduct is made an implicit or explicit term or condition of employment, (2) submission to or rejection of the conduct is used as the basis for any employment decision, or (3) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

This policy forbids harassment based on gender regardless of whether it rises to the level of a legal violation. Examples of gender-based harassment forbidden by this policy include (1) offensive sex-oriented verbal kidding, teasing or jokes; (2) repeated unwanted sexual flirtations, advances or propositions; (3) verbal abuse of a sexual nature; (4) graphic or degrading comments about an individual's appearance or sexual activity; (5) offensive visual conduct, including leering, making sexual gestures, the display of offensive sexually suggestive objects or pictures, cartoons or posters; (6) unwelcome pressure for sexual activity; (7) offensively suggestive or obscene letters, notes or invitations; or (8) offensive physical contact such as patting, grabbing, pinching, or brushing against another's body.

Any violations of this policy may be reported to the Company's Anonymous Reporting Hotline at 877 472 2110.