

## **HARASSMENT FREE WORKPLACE POLICY**

It is the Company's policy and commitment 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.

This policy applies to all employees. A violation of this policy will subject an employee to disciplinary action, up to and including termination of employment.

Harassment is defined as verbal or physical conduct which:

1. Denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, sex, gender identity, sexual orientation, national origin, age, veteran status, disability, or any other legally protected status;
2. Has the purpose or effect of creating an intimidating, hostile or offensive working environment;
3. Has the purpose or effect of unreasonably interfering with an individual's work performance; or
4. Otherwise adversely affects an individual's employment opportunities.

Prohibited harassing conduct includes, but is not limited to:

1. Verbal harassment, including remarks, epithets, slurs, jokes, pranks, negative stereotyping, or threatening, intimidating or hostile acts that relate to race, color, religion, sex, gender identity, sexual orientation, age, national origin, veteran status, disability, or any other legally protected status; and
2. 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 relate to race, color, religion, sex, gender identity, sexual orientation, age, national origin, veteran status, disability, or any other legally protected status.

This policy also prohibits sexual harassment. Sexual harassment is defined as:

1. Unwelcome sexual advances;
2. Requests for sexual favors; and all other verbal or physical conduct of a sexual or otherwise offensive nature, particularly where:
  - A. submission to such conduct is made explicitly or implicitly a term or condition of employment;

- B. submission to or rejection of such conduct is used as a basis for decisions affecting an individual's employment; or
  - C. such conduct has the purpose or effect of creating an intimidating, hostile or offensive working environment.
3. Sexually offensive jokes, innuendoes, and other sexually oriented statements or behavior.

If you experience or observe any prohibited harassment, promptly report the incident to your supervisor. This includes not only supervisor/subordinate actions, but also actions between coworkers, vendors, customer or other non-employees. If you believe it would be inappropriate to discuss the matter with your supervisor, you may bypass him/her and report it directly to anyone in supervision, Executive Management and/or the Office of General Counsel. Your complaint will be investigated and kept confidential to the extent possible. Individuals who make complaints have an obligation to assist and cooperate with the Company's investigation.

If the Company determines that an employee has harassed another employee in violation of this policy, appropriate remedial action will be taken against the offender, up to and including termination.

The Company prohibits any form of retaliation against an employee for lodging a complaint under this policy or for assisting the investigation of a claim of harassment.