

## EQUAL EMPLOYMENT OPPORTUNITY

Our policy is to comply with all applicable federal, state, and local equal employment opportunity laws. The Company strictly prohibits harassment, discrimination, and retaliation against all employees, vendors, contractors, subcontractors, clients, job applicants and/or non-employee on the basis of race, color, creed, religion, sex/gender, national origin or ancestry, age, physical or mental disability, genetic information, pregnancy, childbirth, veteran status, union affiliation, or any other basis protected by federal, state or local law, or ordinance (a "Protected Class").

Any employee at any level found to have engaged in the harassment, discrimination, or retaliation of another employee, vendor, contractor, subcontractor, client, job applicants and/or non-employee in violation of this policy will be subject to appropriate disciplinary action, up to and including termination of employment.

## WORKPLACE ANTI-HARASSMENT, ANTI-DISCRIMINATION & ANTI-RETALIATION POLICY

The Company strictly prohibits harassment, discrimination and retaliation against all employees, vendors, contractors, subcontractors, clients or non-employees on the basis of race, color, creed, religion, sex/gender, national origin or ancestry, age, physical or mental disability, genetic information, pregnancy, childbirth, veteran status, union affiliation, or any other basis protected by federal, state or local law, or ordinance (a "Protected Class"). Verbal, written, recorded, electronically transmitted messages or physical conduct that creates an intimidating, hostile, or offensive work environment is the type of conduct that is prohibited by this policy. Examples of actions that may constitute harassment or discrimination in violation of this policy include epithets, slurs or negative stereotyping, offensive jokes or comments, visual displays such as offensive posters, photos, cartoons, drawings or gestures. Written or other materials in the workplace showing hostility toward an individual because of the individual's Protected Class are also prohibited.

The Company policy also strictly prohibits the unlawful or improper use of Company communications services and equipment in violation of this policy. Improper use includes any harassing, offensive, discriminatory, demeaning, insulting, defaming, intimidating, obscene, and/or sexually suggestive written, recorded, or electronically transmitted ("e-mail", social media, text & voice mail) messages, jokes, stories, or pictures that inappropriately reference a Protected Class. Company communications services and equipment includes but is not limited to interoffice mail, standard postal mail, instant messaging, texting, electronic mail ("e-mail"), courier services, facsimiles, telephone systems, personal computers, computer networks, social media websites, blogs, on-line services, Internet connections, computer files, video equipment and tapes, tape recorders and recordings, pagers, cellular phones and bulletin boards.

### SEXUAL HARASSMENT

The Company strictly prohibits sexual harassment of all employees, vendors, contractors, subcontractors, clients or non-employees. Sexual harassment has been defined as unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment,
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals, or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Examples of behavior that is or may be considered harassment in violation of this policy include but are not limited to:

- **Verbal (Spoken)**  
Sexual innuendoes, suggestive comments, insults, humor and jokes about sex, threats, or sexual demands
- **Non-Verbal**  
Leering, whistling, obscene gestures
- **Physical**  
Intentionally touching or brushing the body, pinching, sexual intercourse or sexual relations, assault
- **Written**  
Harassing, demeaning, obscene, or sexually suggestive pictures, jokes, stories, messages

### RETALIATION

Each person has the responsibility and duty to report to the appropriate person any act that he or she believes is unlawful harassment, discrimination or retaliation. Federal, state and local laws protect employees and applicants from retaliation for engaging in activity protected by anti-discrimination, anti-harassment and anti-retaliation laws, as well as other laws. You will not be penalized for reporting any act you believe in good faith is unlawful harassment, discrimination or retaliation.

### FILING A COMPLAINT

All complaints regarding harassment, discrimination or retaliation by any manager, fellow employee, vendor, client or non-employee **MUST** be reported immediately or as soon as possible. If you feel that you have been subjected to harassment, discrimination, or retaliation, you should report the incident or complaint directly to your manager or supervisor, your regional Human Resources Manager, the Employee Relations Department at **1-800-288-6503** or the Ethics and Compliance Hotline at **1-800-626-1735**.

It is not necessary for an employee to complain first to an offending supervisor in order to report harassment, discrimination or retaliation. Each employee has not only a right, but also a duty, to report conduct, which he or she believes, may constitute harassment, discrimination or retaliation. The Company does not condone or authorize any kind of retaliation against any individual who has made a good faith report of conduct that he or she believes may constitute harassment, discrimination or retaliation or for participating in an investigation in violation of this policy. Again, to file a complaint or to report harassing, discriminatory or retaliatory conduct, you should notify your manager or supervisor, your regional Human Resources Manager, the Employee Relations Department at **1-800-288-6503** or the Ethics and Compliance Hotline at **1-800-626-1735**. Calls to the Ethics and Compliance Hotline may be made anonymously.

### INVESTIGATION

The Company will investigate all allegations of harassment, discrimination and retaliation. The company will maintain confidentiality to the extent consistent with a thorough investigation and subject to applicable laws and regulations or legal proceedings. Any employee that is asked to participate in a Company investigation is required to keep all discussions and events of the investigation confidential, to the extent permitted by law.

### DISCIPLINE

Any employee at any level found to have engaged in the harassment, discrimination, or retaliation of another employee, vendor, contractor, subcontractor, client or non-employee in violation of this policy will be subject to appropriate disciplinary action, up to and including termination of employment.