



1.2 Equal Employment Opportunity, Anti-Discrimination and Anti-Harassment

1. Equal Employment Opportunity and Non-Discrimination

The Company is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that provides equal employment opportunities and prohibits discrimination.

Equal Employment Opportunity has been, and will continue to be, a fundamental principle of the Company where all employment decisions are based upon personal capabilities and qualifications without regard to race, color, religion, sex, pregnancy, sexual orientation, gender identity, genetic information, age, national origin, physical or mental disability, military status, veteran status, citizenship status, protected activity (e.g. opposition to prohibited discrimination or other unlawful activity or participation in a statutory complaint process), or any other protected characteristic as established by law. The Company prohibits and will not tolerate any such discrimination.

This policy applies to all phases of employment and personnel actions including, but not limited to, recruitment, hiring, promotion, demotion, transfers, rates of pay and other forms of compensation, selection for training, discipline and termination of employment. The Human Resources Department has overall responsibility for this policy and maintains reporting and monitoring procedures.

2. Anti-Harassment

The Company prohibits all forms of harassment including sexual harassment and harassment based on race, color, religion, national origin, sex, pregnancy, sexual orientation, gender identity, genetic information, age, disability, military status, veteran status, citizenship status, protected activity, or any other characteristic or protected by law. This applies to all employees and non-employees at Company work sites or functions.

Examples of conduct prohibited by this policy include verbal or physical conduct that:

- Has the purpose or effect of creating an intimidating, hostile or offensive work environment,
- Has the purpose or effect of unreasonably interfering with an individual's work performance,
- Otherwise adversely affects an individual's employment opportunities

Sexual harassment of any kind will not be tolerated. Sexual harassment is prohibited regardless of whether it is directed at persons of the opposite or same gender. Prohibited conduct includes many forms of offensive behavior including:

- Unwelcome sexual advances,
- Offering employment opportunities or benefits in exchange for sexual favors,
- Making or threatening reprisals for a negative response to sexual advances,



- Visual conduct such as leering, making sexual gestures, displaying sexually suggestive objects, photos, screen savers, cartoons or posters,
- Sending obscene, pornographic or otherwise inappropriate communications, including suggestive or obscene letters, invitations, notes, emails or messages,
- Making or using derogatory comments, epithets, slurs and sexist or sexual jokes,
- Graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, and
- Physical conduct such as touching, assault, impeding or blocking movement.

Because it is difficult to predict when conduct or comments might be “unwelcome” or perceived as offensive, employees should avoid all such conduct and behave in a professional manner at all times. The Company prohibits inappropriate behavior regardless of whether anyone has complained about the inappropriate behavior, and regardless of whether the person engaging in the inappropriate behavior intended for it to be offensive. This policy also prohibits inappropriate behavior which was intended only as a joke or was not supposed to be seen or overheard by others.

No supervisor, other employee or non-employee shall threaten or insinuate that another employee's or applicant's refusal to submit to sexual advances will adversely affect any aspect of that person's employment. No supervisor or employee shall promise, imply, or grant any preferential treatment to another employee or applicant in exchange for engaging in sexual conduct. No supervisor or other employee shall engage in another inappropriate behavior which has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

3. Rights and Responsibilities

If an employee believes he/she is being subjected to conduct or comments that violate this policy, and he/she is comfortable doing so, he/she can choose to tell the individual engaging in the behavior that it is offensive and ask that it stop. If that does not work, or if the employee feels uncomfortable doing that, the employee must immediately report these matters to the supervisor, the Senior Manager over the area, to any other member of management, Human Resources or the Ethics Hotline at 855-858-3344 or www.integrareport.com. If the employee believes he/she has been subjected to behavior that violates this policy by the supervisor or other management official with authority over him/her, the employee should immediately report the matter to Human Resources or the Ethics Hotline at 855-858-3344 or www.integrareport.com.

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. For this reason, an employee should always make a report as soon as possible and should not wait for a situation to become worse or unbearable before making a report.

4. Managers' Responsibility

All supervisors and managers have the responsibility to communicate the contents of this policy, educating all employees under their supervision about this policy and how to use it, and enforcing this policy. If a complaint is made to a supervisor or manager, the supervisor or manager is required to notify Human Resources.

5. Retaliation Is Prohibited



The Company prohibits retaliation against any individual that reports discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action, up to and including termination of employment. Any employee who feels that he or she has been threatened with, or subjected to, such reprisal or retaliation should immediately report the reprisal or retaliation to his or her supervisor or Human Resources.

While the Company is committed to preventing and correcting unlawful discrimination, harassment, other inappropriate behavior, and retaliation, it also recognizes that false accusations may harm the innocent party who is falsely accused. Accordingly, any employee who, after an investigation, is found to have knowingly made a false accusation of discrimination, harassment, other inappropriate conduct, or retaliation will be subject to appropriate disciplinary action. If an employee makes a report of what he or she believes in good faith to be discrimination, harassment, other inappropriate behavior, or retaliation, the employee will not be subjected to disciplinary action, even if the employee turns out to have been mistaken.

6. The Investigation

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. Confidentiality will be maintained throughout the investigation process to the extent consistent with adequate investigation and appropriate corrective action.

7. Responsive Action

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination, or termination of employment, as the Company believes appropriate under the circumstances.

Finally, these policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions in order to avoid allegations of harassment.

Individuals who have questions or concerns about this policy should contact Human Resources.