

HARASSMENT

Owner	Human Resources
Effective Date	9/30/2022
Procedure Number	GP-C-05
Revision Number	4

1. Purpose

This policy sets forth the Company's position with regard to harassment, defines harassment, including sexual harassment, provides guidance for reporting perceived harassment, and sets forth disciplinary measures the Company may take against any employee whose conduct is determined to constitute harassment.

2. Background

The Company is committed to promoting the full realization of equal employment opportunity through a positive continuing program of affirmative action and prevention of discriminatory employment practices¹. The Company recognizes harassment of any kind as a serious discriminatory act and is committed to its elimination and prevention.

3. Policy

The Company strictly prohibits any type of discriminatory action or harassment of one employee against another because of race, religion, gender, national origin, age, disability, genetic information, sexual orientation, gender identity, marital, domestic partner, or civil union status. Acts of harassment by employees, supervisors, and managers, will not be tolerated and are subject to disciplinary measures up to and including dismissal.

4. Definition of Harassment and Sexual Harassment

Harassment is a pattern of offensive and/or intimidating conduct directed toward another person that interferes with good working conditions or job opportunities. Sexual harassment is conduct such as unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when (i) such conduct interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment, (ii) submission to such conduct is made explicitly or implicitly a condition of employment, or (iii) submission to or rejection of such conduct is used as the basis for work-related decisions, such as advancement and types of assignments, affecting the individual against whom the conduct is directed.

¹ See GP-C-04, "Equal Employment Opportunity" for full policy statement.

HARASSMENT

Examples of conduct which can create an offensive work environment include unwelcome sexual flirtations, propositions, sexually offensive jokes as well as offensive jokes directed at another person's race, national origin, age or other personal attribute, sexually explicit language, or gestures, displays in the workplace of sexually suggestive objects or pictures, and physical contact such as unwelcome touching, patting, or brushing against another person's body.

5. Enforcement and Procedure for Reporting Harassment

All supervisors are responsible for ensuring that the work environment is free from harassment of any kind. If any such behavior is observed, the supervisor should immediately counsel the employee involved to stop the offending behavior. The supervisor should also notify the Company's Equal Employment Opportunity Coordinator (VP of Human Resources) or the appropriate Human Resources Representative for guidance on taking appropriate disciplinary measures.

Any employee who feels that he or she is the victim of harassment or who has witnessed harassment should immediately notify any member of management, a Human Resources Representative, or the Equal Employment Opportunity Coordinator. There is no retaliation against an employee who reports harassment, and such reports will be kept confidential, given only to those persons who have a need to know. Failure to report any type of harassment will be considered by management to indicate an acceptable working relationship.

6. Disciplinary Action

The Company will conduct an immediate investigation into all known incidents and employee complaints and will take necessary corrective action where incidents are found to be in violation of Company policy. Any employee who is found by the Company to have engaged in harassment in the workplace will be subject to appropriate disciplinary action, up to and including termination of employment.

7. Harassment Awareness and Prevention Training

All new Company employees are required to review this policy as part of their orientation to the Company. In addition, all new employees must complete four core courses, one of which is dedicated to the awareness and prevention of harassment in the workplace. The training consists of informing employees of Company policy, management's responsibility in enforcing the policy, the actions necessary to maintain a harassment-free environment, procedures for reporting harassment, and specific examples of what constitutes harassment, including information relating to sexual harassment.

HARASSMENT

8. Clients, Subcontractors, Representatives, and Suppliers

The Company will encourage its clients, subcontractors, representatives, and suppliers to maintain workplaces free of harassment of any kind, including sexual harassment. Where required by law, the Company will require all persons supplying products or services to comply with this policy. Any occurrence of harassment by or against any Company employee involving any client, subcontractor, representative or supplier of the Company should be reported as described herein.