

Prohibition on Discrimination, Harassment and Retaliation



Harassment based on any protected characteristic is strictly prohibited. Harassment is verbal or physical conduct based on a protected characteristic that creates an intimidating, hostile, or offensive working environment or that interferes with an individual's work performance. Harassment may include, but is not limited to slurs, epithets, disparaging remarks, or jokes, as well as written or graphic material that denigrates or shows hostility to an individual because of a protected characteristic.

Sexual Harassment: Sexual harassment consists of unwelcome sexual advances, requests for sexual acts or favors, or other physical or verbal conduct or visual displays of a sexual nature when:

- 1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment (e.g. hiring, compensation, advancement, promotion or retention);
- 2) submission to or rejection of such conduct by an individual is used as a basis for making employment decisions concerning the individual (e.g. treating a staff member favorably for engaging in such conduct or unfavorably or refusing to engage in the conduct); or
- 3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive environment.

Sexual harassment may include a range of behaviors and may involve individuals of the same or different gender. These behaviors may include, but are not limited to:

- unwanted sexual advances
- subtle or overt pressure for sexual favors
- sexual jokes; innuendos
- advances or propositions
- verbal abuse of a sexual nature
- graphic commentary about an individual's body, sexual prowess, or sexual deficiencies
- leering; whistling; touching, pinching, assault, coerced sexual acts
- display of sexually suggestive objects or pictures including images displayed on a cell phone or in text messages
- other physical or verbal conduct of a sexual nature.

It is also essential to understand that consenting romantic and sexual relationships between coworkers may lead to unforeseen complications. Please refer to the Company policy, found under "Prohibited Interpersonal Relationships" in this handbook, for further guidance.

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REPORTING ALLEGATIONS OF DISCRIMINATION, HARASSMENT, OR RETALIATION

The Company expects all perceived incidents of discrimination, harassment, or retaliation to be reported immediately, regardless of their severity, and regardless of the alleged offender's identity or position. Individuals who believe they have witnessed or been the victim of any form of discrimination, harassment, or retaliation should discuss their concerns with their manager, and/or with Human Resources. In addition, the Company encourages individuals who believe they are being subjected to such conduct to advise the offenders promptly that such behavior is unwelcome and to request that it be discontinued. This is not, however, a requirement prior to making a complaint, and it is not a substitute for the complaint procedure described above. All complaints will be investigated promptly and fully. Such an investigation will typically include interviews of the persons making the complaint, the persons accused of discrimination or harassment, and other persons who may have relevant knowledge.

If the Company finds that prohibited conduct has occurred, it will take effective and appropriate corrective measures. Such measures may include discipline up to and including suspension or termination of any team member found to have violated this policy. In addition, any team member who willfully makes a false allegation or false statement under this policy will be subject to appropriate disciplinary action, which may include suspension or termination of employment.

As noted above, no adverse action will be taken against a team member for exercising his or her rights under applicable law or for making a good faith complaint or assisting in an investigation under this policy. Any threats or attempts at retaliation must be reported to your manager and Human Resources immediately.

All complaints of discrimination or harassment and any information received during the course of the investigation and the resolution of the investigation will be kept strictly confidential and made available for review only by those with a legitimate need to know, as determined by the Company in its sole discretion, unless required otherwise by law. All personnel, including the person making the complaint, who are involved in the investigation are expected to use discretion in maintaining the confidentiality of information and documents generated or discussed during the investigation. This provision is not intended, of course, to restrict an individual's ability to exercise his or her rights under applicable law.

Chris Collins, Senior HR Manager, is the designated EEO Coordinator for the company. The EEO Coordinator's responsibility is monitor adherence to this policy.

Team members and applicants should contact Chris Collins at (313) 442-1309 within forty-five calendar days of any concerns regarding discrimination or reprisal to preserve the right to raise a formal complaint.