



## Non-Harassment Policy

It is the Company's policy to provide employees with a workplace free from all forms of unlawful harassment, including sexual harassment.

Harassment based on an employee's race, color, sex, religion, national origin, marital status, handicap, or sexual orientation or any other protected classification, is a violation of Title VII of the Civil Rights Act of 1964 and state laws against discrimination. The company will not permit any employee, male or female, to harass another employee in any way. Unlawful and impermissible harassment may involve, but is not limited to:

1. Unwelcome sexual advances; or
2. Requests for sexual favors; or
3. All other verbal or physical conduct of a sexual or otherwise offensive nature where:
  - Submission to such conduct is made either explicitly or implicitly a term or condition of employment.
  - Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals; and,
  - Such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment.

Harassment refers to behavior that is not welcome, that is personally offensive, that fail to respect the rights of others, that lowers morale and that, therefore, interferes with our working effectiveness. Unlawful harassment may take different forms. One specific form is the demand for sexual favors. Other forms of harassment include, but are not limited to:

1. Verbal  
Innuendos, suggestive comments, inappropriate jokes, racial or ethnic slurs, profanity, sexual propositions or threats.
2. Non-Verbal  
Suggestive objects or pictures, graphic commentaries, suggestive or insulting sounds, leering, whistling, obscene gestures.
3. Physical  
Unwanted physical contact, including touching, pinching, brushing the body, pushing.
4. Electronic Communications  
Threatening, harassing or offensive comments via emails, voicemails and other forms of electronic communications.

Whatever form it takes, harassment is insulting and demeaning to the recipient and will not be tolerated in the workplace. All members, employees, and non-supervisors alike must comply with this policy and take appropriate measures to ensure that such conduct does not occur. Violation of this policy may result in disciplinary action up to and including termination.

Employees who believe that they have been the subjects of harassment, including harassment by a customer or vendor, should immediately report the matter to his/her supervisor, manager or the Human

Resource Department, who will conduct a prompt and effective investigation.

So that steps may be taken to stop the harassment, no retaliatory measures will be taken against any member who complains of harassment. Under no circumstances is the employee required to report the harassment to a manager or supervisor who he/she is accusing of harassment. The company will, to the maximum extent feasible, maintain the confidentiality of such complaints on a need-to-know basis. However, investigation of such complaints will generally require gathering pertinent facts.