ANTI-HARASSMENT POLICY

Overview

We strive to create and maintain a work environment in which people are treated with dignity, decency and respect. For that reason, we will not tolerate unlawful discrimination or harassment of any kind. All employees and independent contractors are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur.

Harassment

We prohibit any form of harassment including but not limited to harassment related to an individual’s:

- Ancestry
- Age
- Color
- Disability (physical and mental, including HIV and AIDS)
- Genetic information
- Gender, gender identity, or gender expression
- Marital status
- Medical condition (genetic characteristics, cancer, or a record or history of cancer)
- Military or veteran status
- National origin (including language use restrictions)
- Race
- Religion or creed (including religious dress and grooming practices)
- Sex (including pregnancy, childbirth, breastfeeding and/or related medical conditions)
- Sexual orientation

Harassment is also prohibited on any other basis protected by federal, state, or local law, ordinance or regulation.

Harassment may take many forms, including but not limited to:

- Verbal conduct, such as epithets, derogatory jokes or comments, slurs, or unwanted sexual advances, invitation, or comments;
- Visual or written conduct, such as derogatory and/or sexually oriented text messages, instant messages, emails, tweets and internet postings, posters, photography, cartoons, drawings, or gestures; or
- Physical conduct, such as assault, unwanted touching, or blocking normal movement.

Sexual Harassment

We will not tolerate any form of sexual harassment, which, by way of example includes:

- Making unwanted sexual advances, including verbal advances, propositions or requests;
- Engaging in unwanted physical conduct, such as touching or assaulting another person, or impeding or intentionally blocking another person’s movements;
• Conditioning an employment benefit, such as a raise, promotion or assistance with a person’s career, on sexual favors;
• Threatening an adverse employment action, such as termination, demotion, or disciplinary action, for a refusal of a request for a sexual favor; or
• Creating an offensive, intimidating or hostile working environment by touching another person in an inappropriate manner, leering, making sexual gestures, displaying sexually suggestive objects, pictures, cartoons or posters, making graphic verbal comments about a person’s body, using sexually degrading words, or writing or distributing suggestive or obscene letters, notes, e-mails, text messages, instant messages, tweets or internet postings.

Sexual harassment includes the harassment of women by men, men by women and same-sex gender-based harassment.

Complaint Procedure

If you believe you have been the victim of harassment or if you have witnessed harassment, you should bring the matter to the attention of your manager or Human Resources immediately. Or, if you wish to remain anonymous, you can report the incident through our anonymous Speak-Up Line.

Upon receipt of a complaint, we will conduct an investigation. We will handle all complaints swiftly and confidentially to the extent possible in light of the need to conduct a thorough investigation.

Appropriate disciplinary action will be taken against any individual who violates this policy. Based on the seriousness of the offense, disciplinary action may include training, verbal or written reprimand or termination of employment. We will take steps as necessary to prevent further harassment.

Retaliation

No individual will be subject to retaliation for making a good faith report of harassment, indicating an intention to report harassment, or for participating in an investigation under this policy. Any individual who believes he or she has been retaliated against in violation of this policy should use the Complaint Procedure described above.