

Anti-Harassment and Discrimination Free Work Environment/Pay Transparency Non Discrimination Provision

HUMAN RESOURCES PROCEDURE

Procedure Number: 1-04

Subject: Anti-Harassment and Discrimination Free Work Environment/
Pay Transparency Non Discrimination Provision

Applicability: All Employees

Revision Date: January 1, 2017

Respect is the cornerstone of creating a harassment-free and discrimination-free work environment where employees can contribute to their fullest potential. Employment decisions must be made based on merit and qualifications without regard to an individual's gender, gender identity, race, color, religion, national origin, age, physical or mental disability, marital status, sexual orientation, veteran status, or other conditions protected by law.

Harassment is a form of discrimination that has the purpose or effect of unreasonably interfering with an individual's work performance, creating a hostile or offensive work environment, or otherwise adversely affecting an individual's employment opportunities.

Harassment may include, but is not limited to, the use of epithets, slurs, stereotyping, intimidating or offensive conduct, displaying or distributing offensive materials, and making offensive jokes and comments based on the above classifications, including but not limited to displaying, housing, storing, retaining, transmitting or distributing offensive material by means of Company property such as computer, cell phone, Blackberry® or other electronic device.

Employees who have experienced or witnessed discrimination or harassment are to immediately report the incident so that the Company can act to stop it before it becomes severe or pervasive. Employees may report complaints to a supervisor, a Human Resources representative, the compliance officer, or to the Company's Ethics Help Line. Supervisors or the compliance officer must report any complaints to a Human Resources representative prior to attempting resolution. Employees may also report discrimination or harassment to the U.S. Equal Employment Opportunity Commission (EEOC) or their State human rights agency and should be cognizant of filing the charge in a timely manner and within the strict time limits established by the applicable agency. The Company does not tolerate harassment or discrimination and will take prompt corrective action if violations occur. Complaints will be kept as confidential as possible and retaliation is strictly prohibited.

Pay Transparency Nondiscrimination Provision

The contractor will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

**Contractors doing business with the Company via a staffing agency and/or vendor agreement are also generally expected to comply with the principles of this policy unless the policies/terms of their employing agency or vendor agreement specifically dictate otherwise.*

This document is a summary of a Company policy, procedure and/or guideline. All policies, procedures and/or guidelines described herein may be modified or discontinued at any time, for any reason at the Company's full and sole discretion. No policy, procedure and/or guideline should be construed as a contract or term or condition of employment between an employee and the Company.

If any statements contained herein are inconsistent with formal plan documents, those documents will govern.