

NO HARASSMENT/DISCRIMINATION POLICY

It is the Company's policy to maintain a working environment free of unlawful discrimination.

Sexual harassment is unacceptable conduct which violates this policy. Our policy concerning sexual harassment in the workplace is clear. It is against the law; it will not be tolerated.

Sexual harassment encompasses a wide range of unwanted, sexually directed behavior and has been defined in the following manner:

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitutes sexual harassment when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, or (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, 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 working environment.

A hostile environment may include jokes, vulgar comments, sexually suggestive cartoons, e-mails, or posters, as well as actual physical abuse or touching.

Sexual harassment applies to the conduct of a supervisor toward a subordinate, an employee toward another employee, a non-employee toward an employee, or an employee toward an applicant for employment. Sexual harassment can apply to conduct outside the workplace as well as on the work site.

Employees should take immediate action when sexual harassment occurs. Employees who believe they have been harassed should take the following action:

1. Express your discomfort to the harasser. Speak to the harasser about his/her conduct or behavior. State what action you find objectionable and want stopped. Respond immediately to the offending conduct or behavior. **Do not ignore the problem.**

2. Notify a Human Resources representative or an officer of the Company immediately. The Company will respond to your complaint. By notifying the Company of improper conduct, it can take prompt steps to remedy the situation.

Employees who wish to register a complaint may do so through many different channels. You may register a complaint with any Human Resources representative or any officer of the Company.

3. If you are harassed by a non-employee, immediately report the incident to a Human Resources representative or an officer of the Company.

4. Keep the human resources department informed about any repeat occurrence after the harasser has been notified that his/her conduct is offensive.

All managers, supervisors, and employees are responsible for creating a workplace free from unlawful discrimination or harassment. You should be aware how your co-workers react to your comments and actions. If co-workers object to or seem uncomfortable with your conduct, heed the objection and discontinue the conduct that is objectionable. Remember that what is acceptable behavior to some employees, may not be acceptable to others.

Any manager, supervisor, or employee who witnesses or becomes aware of instances of sexual harassment must report such instances to a Human Resources representative or to an officer of the Company. Violations of this reporting requirement may be grounds for disciplinary action, up to and including termination.

Retaliation for harassment complaints is also against the law and will not be tolerated. Retaliation includes any adverse employment action against an employee because the employee has complained about or resisted harassment, discrimination, or retaliation, or has cooperated in an investigation. Refusal to cooperate in an investigation of harassment or retaliation is also prohibited.

Allegations of sexual harassment or retaliation will be investigated thoroughly. The facts will determine the response to each allegation. Substantiated acts of sexual harassment or retaliation will be met with appropriate disciplinary action, up to and including termination. Information regarding specific incidents will be kept confidential within the necessary boundaries of the fact-finding process.

Similarly, discrimination or harassment concerning age, race, color, sex, religion, national origin, citizenship status, disability, or any other category protected under applicable law is also unlawful and against the Company's policy. Such discrimination or harassment should be reported as described above and will be investigated as described above.