

Non-Harassment Policy

Harassment and discrimination will not be tolerated. The Company is committed to providing a workplace for all employees that is free of harassment so that everyone can work in a productive, respectful and professional environment. The Company maintains a strict policy prohibiting harassment against applicants and employees based on any legally-recognized status including race, color, creed, religion, national origin or ancestry, age, sex including pregnancy, lactation, child-bearing capacity, childbirth, sterilization, fertility or related medical conditions, gender identity or expression, marital status, sexual orientation, present or past history of mental disability, learning disability or physical disability, including blindness, genetic information (including testing and characteristics), veteran status, uniformed service member status, or any other characteristics protected by law. Employees who violate this policy are subject to discipline, up to and including termination of employment.

These requirements apply to all persons involved in the Company's operations regardless of their position, including co-workers, supervisors, managers and officers. This policy also protects employees from prohibited harassment by third parties such as affiliates, customers, vendors, clients, visitors, or temporary or seasonal workers. If such harassment occurs in the workplace by someone not employed by the Company, the procedures in this policy should be followed. The workplace includes: actual worksites, any setting in which work-related business is being conducted (whether during or after normal business hours) and company-sponsored events. While the laws of countries outside the U.S. may not prohibit harassment based on the aforementioned protected characteristics, the Company nonetheless expects its employees in all locations globally to comply with this non-harassment policy, unless prohibited by applicable non-U.S. laws. Where required by applicable law, the Company provides training regarding harassment and discrimination to its employees.

This policy is also violated if an employee is fired, denied a job, or denied some other employment benefit because the employee refused to grant sexual favors, complained about harassment, or assisted in an investigation of harassment.

The Company is committed to taking all reasonable steps to prevent harassment from occurring and will take immediate and appropriate action when we know that unlawful discrimination or harassment has occurred. To do this, however, we need the cooperation of employees at all levels.

Escalation Process & Corrective Action

Each employee is responsible for supporting and adhering to this policy. Employees are encouraged, but not required, to communicate to the offending person that his/her conduct is offensive and unwelcome. Employees should promptly report any offensive harassing behavior, whether such behavior is directed towards him/her personally or to other employees at the Company. Applicants and employees are encouraged to report concerns, even if they relate to incidents in the past, involve individuals who are no longer affiliated with the Company, or concern conduct occurring outside of work if it impacts the individual at work. Employees are not required to make the report to their immediate supervisor, manager or person who has engaged in the complained of conduct. Employees are strongly encouraged to report concerns about harassment before behaviors become severe or pervasive, as the Company strives to stop any inappropriate conduct immediately and before it raises to the level of a violation of any anti-discrimination or other law. Supervisors and managers who know or receive reports or complaints of offending behavior must promptly notify Human Resources so that appropriate action can be taken.

The Company will promptly, thoroughly, and objectively investigate all claims of harassment. Complaints of harassment will be handled with sensitivity and discretion and will strive to maintain confidentiality to the extent allowed by the circumstances and permitted by law. Generally, this means that allegations of harassment are shared with those who have a need to know so that the Company can thoroughly and effectively complete the investigation.

If the Company concludes that unlawful or otherwise improper harassment occurred, prompt and effective remedial action will be taken. This may include discipline of the offending person and other actions to remedy the effects of the harassment and prevent further discrimination or harassment. No retaliation will be taken against any employee who in good faith files a complaint of unlawful or improper harassment or assists in the investigation of such a complaint. Employees who believe they have been retaliated against for having reported discrimination or harassment or for participating in an investigation must promptly notify any Company manager, the Human Resources Department, Group President or Corporate General Counsel, or the Company's Chief Human Resources Officer so their concerns may be investigated. Appropriate corrective measures will be taken if allegations of retaliation are substantiated, which may include disciplinary action against the employee who has retaliated, up to and including termination of employment.