

Sexual Harassment & Other Unlawful Discrimination and Harassment

The Company will not tolerate verbal or physical conduct by any employee that discriminates against any co-workers, visitors, customers or others' associated with the Company, or which harasses, disrupts or interferes with another's work performance or which creates an intimidating, offensive or hostile working environment, including but not limited to any form of sexual harassment or any harassment/discrimination based on race, color, religion, gender (including pregnancy), national origin/ancestry, genetic information, age, disability status, marital or civil union party status, military/veteran status, gender identity/expression, sexual orientation, genetic information, hair texture/protective hairstyles or any other categories protected by applicable federal or state law.

Discrimination or harassment can take many forms. It may be, but is not limited to: words, conduct, adverse job action, visual images, "jokes, pranks," intimidation, physical contact, or violence. While all forms of discrimination and harassment based on an employee's legally protected status are prohibited, including but not limited to any adverse job action or intimidation based on those categories identified above, it is the Company's policy to emphasize that sexual harassment is illegal and prohibited by both state and federal law. Specifically, it is contrary to Company policy for any employee to sexually harass another individual by:

- Making unwelcome sexual conduct or requests for sexual favors a condition of an employee's continued employment; or
- Using an employee's submission or rejection of such conduct as the basis for making employment decisions (ex: promotions, raises); or
- Creating a work environment in which conduct of a sexual nature substantially interferes with an individual's work performance or creates an atmosphere intimidating, hostile or offensive to employees.

Although not an inclusive list, the following are examples of the type of conduct prohibited by the policy against sexual harassment:

- Unwelcome sexual advances, propositions or flirtations;
- Unwelcome attention of a sexual nature such as degrading comments, suggestive or lewd remarks, propositions, jokes, tricks or noises, drawings, doodles or cartoons;
- Unwanted hugs, touches, kisses or requests for sexual favors;
- The threat or suggestions that continued employment, advancement, assignment or earnings depend on whether or not the employee will submit to or tolerate harassment; or
- Retaliation for complaining about sexual harassment.

All employees are further advised that sexually explicit or sexually offensive material has no place within the Company. Such material may not be posted, displayed, or even possessed. Possession of such material, even if it is not posted or publicly displayed, will be considered a violation of Company policy and will subject the individual to disciplinary action, up to and including termination.

HR & Compliance Manager and/or to Safety/Risk Management and/or the Company
President/CEO

The Company provides a copy and overview of its anti-harassment and discrimination policy to all new employees at time of hire. In addition, the Company provides sexual harassment awareness and prevention training sessions to new hires and current employees in accordance with applicable legal requirements.

The Company expects all those associated with the Company to help the Company avoid and appropriately redress any potential claims of harassment or discrimination. The Company encourages any individuals who believe they are being subjected to unwelcome harassment or unlawful discrimination to promptly advise the claimed offender that his or her behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. The Company recognizes, however, that an individual may not be comfortable raising their concerns directly with the claimed offender. Therefore, individuals who believe that the actions or words of a supervisor or fellow employee or any outside party in the workplace constitute unwelcome harassment or unlawful discrimination, or who believe they have witnessed such conduct, can inform their immediate supervisor (or any other member of management to whom they feel comfortable discussing the situation) and/or the HR & Compliance Manager, the Safety/Risk Management or the Company President/CEO. Any supervisor who observes and/or is made aware of an incident or complaint regarding unlawful discrimination or harassment must immediately report the same to the HR & Compliance Manager, the Safety/Risk Management or the Company President/CEO.

An applicant, intern or employee also has the right to file a complaint for any claimed acts of discrimination, harassment or retaliation with the applicable state or federal agency within the applicable limitations' periods established by law. For more information, individuals may contact the Equal Employment Opportunity Commission ("EEOC") (www.eeoc.gov). Individuals working in Connecticut may contact the Connecticut Commission on Human Rights & Opportunities ("CHRO") (www.ct.gov/chro) and/or access the following link to the CHRO's website https://www.ct.gov/chro/lib/chro/Sexual_Harassment_Flyer.pdf) to obtain information concerning the unlawfulness of sexual harassment and the remedies available to victims of sexual harassment.

The Company will promptly investigate any reported allegations of harassment, discrimination or retaliation. The investigation may include interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. The Company will maintain confidentiality throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action. During the investigation, the Company expects that the reporting employee, the alleged offender and any other employees or witnesses aware of the incident will treat this information in a confidential manner so as not to defame anyone or invade anyone's privacy.

The Company will take prompt action following its investigation into a complaint of unlawful harassment or discrimination or retaliation. Any employee determined to have committed unlawful harassment or discrimination or retaliation will be subject to appropriate disciplinary action, up to and including termination. Moreover, any individual who makes an unwelcome advance, threatens or in any way discriminates or harasses an employee or other person associated with the Company based on a legally protected status may be personally liable for monetary damages and/or criminal prosecution for such actions, and may further be subject to other actions as the Company may determine to be necessary to address the matter.

Any form of retaliation against an employee or any other person associated with the Company who in good faith files a complaint or cooperates in an investigation into such complaint is strictly prohibited. Any applicant or employee who feels they have been retaliated against should immediately report their complaint of retaliation as set out above. Any retaliatory actions toward the person who filed the complaint or toward any person(s) involved in any discrimination and/or harassment incident (including witnesses) will result in appropriate disciplinary action, up to and including termination.