

		<h2>COMMITMENT TO DIVERSITY POLICIES</h2>		
<b>PROCEDURE NUMBER:</b> CIM0011	<b>REV: 01</b>	<b>ORIGINAL ISSUE DATE:</b> 04/09/2020	<b>REVISION DATE:</b> 06/30/2020	
<b>PREPARED BY:</b> HUMAN RESOURCES	<b>REVIEWED BY:</b> HR, MANAGEMENT, AND LEGAL	<b>APPROVED BY:</b> VP HUMAN RESOURCES	<b>APPROVED BY:</b>	

## 1.0 PURPOSE

The Company is committed to fostering, cultivating and preserving a culture of diversity and inclusion. Our employees are the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

The Company's diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.

## 2.0 EQUAL EMPLOYMENT OPPORTUNITY

The Company is an equal opportunity employer. In accordance with applicable law, we prohibit discrimination against any applicant or employee based on any legally-recognized basis, including, but not limited to: veteran status, uniformed servicemember status, race, color, religion, sex, age (40 and over), pregnancy (including childbirth, lactation and related medical conditions), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), sexual orientation, gender identity or any other consideration protected by federal, state or local law. Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination by any employee, including supervisors and co-workers.

Furthermore, it is Company policy to provide equal opportunity to individuals with disabilities and protected veterans in all phases of the employment process and in compliance with applicable laws. This policy of non-discrimination shall include, but not be limited to: recruiting, hiring, promotions, demotions or transfers, layoffs, recalls, terminations, rates of pay or other forms of compensation, selection for training, and recruitment or recruitment advertising.

The Company will provide reasonable accommodations to any employee with a known disability who is otherwise qualified to perform the essential functions of his/her job, unless such an accommodation would present undue hardship on the Company's business operations or unless doing so causes a direct threat to the health and safety of the employee or others in the workplace. An employee who believes that he/she requires a reasonable accommodation because of a disability must notify Human Resources.

The Company is committed to providing employees with a work environment free of discrimination and harassment. All employment decisions at the Company are based on business needs, job requirements and individual qualifications.

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## **2.1 Complaint Procedure**

Any employee who believes that he or she has been harassed, discriminated against or subject to retaliation by a co-worker, supervisor, agent, client, vendor or customer of the Company in violation of this policy, or who is aware of such harassment, discrimination of or retaliation against others, should immediately provide a written or verbal report to his or her supervisor, any other member of management or to Human Resources.

After a report is received, a thorough and objective investigation by management will be undertaken. The investigation will be completed, and a determination made and communicated to the employee as soon as practical. The Company expects that all employees fully cooperate with any investigation conducted by the Company into a complaint of proscribed harassment, discrimination or retaliation, or regarding the alleged violation of any other Company policies.

If we determine that this policy has been violated, remedial action will be taken, commensurate with the severity of the offense. Appropriate action will also be taken to deter any future harassment or discrimination prohibited by this policy. If a complaint of prohibited harassment, discrimination or retaliation is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken.

The Equal Employment Opportunity Commission (EEOC) and equivalent state agencies will accept and investigate charges of unlawful discrimination or harassment at no charge to the complaining party.

## **2.2 Protection Against Retaliation**

Retaliation is prohibited against any person by another employee or by the Company for using this complaint procedure, reporting proscribed harassment, or for filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Employees should report any retaliation prohibited by this policy to his/her supervisor, any management team member or Human Resources. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken.

## **3.0 SEXUAL AND OTHER UNLAWFUL HARASSMENT**

The Company is committed to providing a work environment that is free of illicit harassment. As a result, the Company maintains a strict policy prohibiting sexual harassment and harassment against applicants and employees based on any legally-recognized basis, including, but not limited to: veteran status, uniformed service member status, race, color, religion, sex, age (40 and over), pregnancy (including childbirth, lactation and related medical conditions), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics) or any other consideration protected by federal, state or local law. All such harassment is prohibited.

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This anti-harassment policy applies to all persons involved in our operations and prohibits harassing conduct by any employee of the Company, including nonsupervisory employees, supervisors and managers. This policy also protects employees from prohibited harassment by third parties, such as vendors, clients, or temporary or seasonal workers. If such harassment occurs on the job by someone not employed by the Company, the procedures in this policy should be followed.

### 3.1 Sexual Harassment Defined

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

While it is not possible to identify each act that constitutes or may constitute sexual harassment, the following are some examples.

- Touching, such as rubbing or massaging someone's neck or shoulders, stroking someone's hair, or brushing against another's body;
- Sexually suggestive touching;
- Grabbing, groping, kissing, or fondling;
- Unwelcome requests for sexual favors;
- Lewd or derogatory comments or jokes;
- Fowl or obscene language;
- Violating someone's "personal space";
- Questions about one's sex life or experiences;
- Comments regarding sexual behavior or the body of another employee;
- Sexual innuendo and other vocal activity such as catcalls or whistles;
- Obscene letters, notes, emails, invitations, photographs, cartoons, articles, or other written or pictorial materials of a sexual nature;
- Repeated requests for dates after being informed that interest is unwelcome;
- Sexual assault or rape;
- Retaliating against an employee for refusing a sexual advance or reporting an incident of possible sexual harassment to the Company or any government agency;
- Offering or providing favors or employment benefits such as promotions, favorable evaluations, favorable assigned duties or shifts, etc., in exchange for sexual favors;
- Any unwanted physical touching or blocking/impeding movements, and
- Abusive or malicious conduct that a reasonable person would find hostile, offensive, and unrelated to the Company's legitimate business interactions.

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### **3.2 Other Types of Harassment**

Harassment on the basis of any legally protected classification is prohibited, including harassment based on veteran status, uniformed servicemember status, race, color, religion, sex, age (40 and over), pregnancy (including childbirth, lactation and related medical conditions), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics) or any other consideration protected by federal, state or local law. Prohibited harassment may include behavior like the illustrations above pertaining to sexual harassment. They include conduct such as:

- Verbal conduct including threats, epithets, derogatory comments or slurs based on an individual's protected classification;
- Visual conduct including derogatory posters, photography, cartoons, drawings or gestures based on protected classification; and
- Physical conduct including assault, unwanted touching or blocking normal movement because of an individual's protected status.

### **3.3 Complaint Procedure**

Any employee who believes that he or she has been subjected to prohibited harassment, discrimination or retaliation by a co-worker, supervisor, agent, client, vendor or customer of the Company, or who is aware of such harassment, discrimination or retaliation of others, should immediately provide a written or verbal report to his or her supervisor, any other member of management or Human Resources regarding such incidents. After a report is received, a thorough and objective investigation by management will be undertaken. The investigation will be completed, and a determination made and communicated to the employee as soon as practical.

If a complaint of prohibited harassment or discrimination is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken.

The federal Equal Employment Opportunity Commission (EEOC) and equivalent state agencies will accept and investigate charges of unlawful discrimination or harassment at no charge to the complaining party. The nearest office of the EEOC and equivalent state agencies can be found by visiting the EEOC's website at [www.eeoc.gov](http://www.eeoc.gov).

### **3.4 Protection Against Retaliation**

Retaliation is prohibited against any person by another employee or by the Company for using this complaint procedure, reporting proscribed harassment or discrimination, objecting to such conduct or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Employees should report any retaliation to their supervisor, any management team member or Human Resources. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation prohibited by this policy is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken.

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#### 4.0 DISABILITY ACCOMODATION

To comply with applicable laws ensuring equal employment opportunities for individuals with disabilities, the Company will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an employee or applicant for employment unless undue hardship and/or a direct threat to the health and/or safety of the individual or others would result.

Any employee who requires an accommodation in order to perform the essential functions of his or her job, enjoy an equal employment opportunity and/or obtain equal job benefits should contact Human Resources to request such an accommodation. Human Resources will communicate with the employee and engage in an interactive process to determine the nature of the issue and what, if any, reasonable accommodation may be appropriate. In some cases, this interactive process may be triggered without a request from the employee, such as when the Company receives notice from its own observation or another source that a medical impairment may be impacting the employee's ability to perform his or her essential job functions.

Employees who believe they need an accommodation must specify, preferably in writing, what barriers or limitations prompted the request. The Company will evaluate information obtained from the employee, and possibly his or her health care provider or another appropriate health care provider, regarding any reported or apparent barriers or limitations and will then work with the employee to identify possible accommodations, if any, that will help to eliminate or otherwise address the barrier(s) or limitation(s). If an identified accommodation is reasonable and will not impose an undue hardship on the Company and/or a direct threat to the health and/or safety of the individual or others, the Company will generally make the accommodation or may propose another reasonable accommodation that may also be effective. Employees are required to cooperate with this process by providing all necessary supporting documentation of supporting the need for accommodation and being willing to consider alternative accommodations when applicable.

The Company will also consider requests for reasonable accommodations for medical conditions related to pregnancy, childbirth and lactation where supported by medical documentation and/or as required by applicable federal, state or local law.

Employees who wish to request unpaid time away from work because of a qualifying disability should speak to Human Resources regarding a proposed accommodation.

#### 5.0 RELIGIOUS ACCOMODATION

The Company will provide reasonable accommodation for employees' religious beliefs, observances and practices when a need for such accommodation is identified and reasonable accommodation is possible. A reasonable accommodation is one that eliminates the conflict between an employee's religious beliefs, observances or practices and the employee's job requirements, without causing undue hardship to the Company. The Company has developed an accommodation process to assist employees, management and Human Resources. Through this process, the Company establishes a system of open communication between employees and the Company to discuss conflicts between religion and work and to take action to provide reasonable accommodation for employees' needs. The intent of this process is to ensure a consistent approach when addressing religious accommodation requests.

Any employee who perceives a conflict between job requirements and religious belief, observance or practice should bring the conflict and his or her request for accommodation to the attention of Human Resources to initiate the accommodation process. The Company requests that accommodation requests be made in writing, and in the case of schedule adjustments, as far in advance as possible.

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### 6.0 LACTATION ACCOMODATION

The Company has created a mother-friendly employee worksite lactation support program. The program provides a work environment that is supportive of lactating mothers. Lactation times will be established for any employee who wishes to express breast milk or breastfeed, based on her work schedule. If possible, the lactation time will run concurrently with any break time already provided. Lactation time beyond the regular break time is unpaid for nonexempt employees and will be negotiated between the employee and the Company.

The Company will provide a private space, other than a bathroom, for lactating mothers to express milk. Where feasible, that space will be dedicated for the specific use of expressing milk by lactating mothers. Where dedicated space is not feasible, the Company will provide a mixed-use space where lactating mothers will have priority over all other users of the space. Access to a safe water source and a sink within a reasonable distance from the lactation space will be provided. Employees may store their expressed milk in their own personal coolers with an ice pack or in the shared break room refrigerator space, if available.

The Company complies with applicable federal law regarding lactation accommodation.

**This Policy supersedes all prior policies and statements, whether verbal or written, regarding the subject matter contained herein. The Company reserves the right to change, amend, modify or terminate this Policy at any time.**