

## Discrimination And Harassment Policy

It is the policy of G.S.W. to promote a productive work environment and not to tolerate verbal or physical conduct by any employee that harasses, disrupts, or interferes with another's work performance or that creates an intimidating, offensive or hostile environment.

1. Employees are expected to maintain a productive work environment that is free from harassing or disruptive activity. No form of harassment will be tolerated, including harassment for the following reasons: race, national origin, religion, disability, pregnancy, age, military status, sexual orientation, or sex.
2. Each supervisor and manager have a responsibility to keep the workplace free of any form of harassment or discrimination. No supervisor or manager is to threaten or insinuate, either explicitly or implicitly, that an employee's refusal or willingness to submit to sexual advances will affect the employee's terms or conditions of employment. No supervisor or manager is to threaten, insinuate, or make changes in an employee's terms and conditions of employment based upon an employee's race, national origin, religion, disability, pregnancy, age, military status, sexual orientation, or sex.
3. Sexually harassing or offensive conduct in the workplace, whether committed by supervisors, managers, non-supervisory employees, or non-employees, is also prohibited. This conduct includes, but is not limited to:
  - (a) Unwanted physical contact or conduct of any kind, including sexual flirtations, touching, advances, or proposition.
  - (b) Verbal abuse of a sexual nature.
  - (c) Demeaning, insulting, intimidating, or sexually suggestive comments about an individual's dress or body.
  - (d) The display in the workplace of demeaning, insulting, intimidating or sexually suggestive objects or pictures, including nude photography.
  - (e) Any electronically transmitted messages that are demeaning, insulting, intimidating, or sexually suggestive, whether written or recorded.
4. Harassing or offensive conduct based upon race, national origin, religion, disability, pregnancy, age, military status, or sexual orientation in the workplace, whether committed by supervisors, managers, non-supervisory employees, or non-employees, is also prohibited. This conduct includes, but is not limited to:
  - (a) Unwanted physical contact or conduct of any kind, impeding or blocking movement, or any interference with normal work or movement directed at an individual.
  - (b) Verbal abuse or harassment such as epithets, derogatory comments, or slurs.

- (c) Demeaning, insulting, or intimidating comments about an individual's race, national origin, religion, disability, pregnancy, age, military status, sexual orientation, or sex.
- (d) The display in the workplace of demeaning, insulting, intimidating objects or pictures.
- (e) Any electronically transmitted messages that are demeaning, insulting, intimidating, whether written or recorded.

Any employee who believes that a supervisor's, manager's, other employee's or non-employee's actions or words constitute unwelcome harassment or discrimination based on race, national origin, religion, disability, pregnancy, age, military status, sexual orientation, or sex has a responsibility to report or complain about the situation as soon as possible. G.S.W.'s ability to remedy instances of unlawful harassment can only be accomplished if appropriate representatives of the Company are properly and timely notified. Therefore, please keep in mind that your failure to properly follow this procedure to report inappropriate conduct as described herein may keep you, if you are the injured party, from obtaining a remedy from G.S.W. and/or having this matter rectified by G.S.W. Under our Speak Up Policy reports or complaints may be made to the employee's direct supervisor, manager, HR Manager, or our Integrity, Ethics & Compliance Service.

- 5. Complaints of discrimination or harassment are to be managed and investigated under G.S.W.'s Speak Up Policy and will be managed promptly and in as impartial and confidential manner as possible. Employees are required to cooperate in any investigation. A timely resolution of each complaint should be reached and communicated to the parties involved.
- 6. Any employee, supervisor, or manager who is found to have violated the harassment policy will be subject to appropriate disciplinary action, up to and including termination.
- 7. G.S.W. prohibits any form of retaliation against employees for bringing good faith complaints, participating in an investigation, or providing information about discrimination or harassment. If you feel that you have been retaliated against for any of these reasons, please let us know immediately so that we can put a stop to it and take appropriate disciplinary action against the perpetrator, up to and including termination. In addition, if an investigation of a complaint shows it was made in bad faith, the complaint is false the individual who made the complaint in bad faith will be subject to disciplinary action, up to and including termination.