

## 1. Purpose

- a) ELEVATE is committed to providing all employees with a work environment free from unlawful bias, discrimination and harassment, and to promoting equal opportunities for all qualified employees without regard to race, color, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, disability or veteran status, or any other basis protected by the legislation of the countries in which we operate.
- b) Unlawful harassment, in whatever form and regardless of the intent, is a form of discrimination and interferes with ELEVATE's commitment to equal employment opportunities for all employees.
- c) ELEVATE is committed to maintaining a workplace where employees are free from any form of harassment (not just harassment that is unlawful) and are treated with dignity and respect. ELEVATE expects that its employees and other representatives of ELEVATE will conduct themselves with integrity, professionalism and good judgment. Accordingly, verbal, physical or visual conduct by an employee that harasses, disrupts or interferes with another's work performance or that creates an intimidating, offensive or hostile work environment will not be tolerated.
- d) The purpose of this Harassment Free Workplace Policy ("this Policy") is to establish Company-wide standards regarding the prevention and investigation of both unlawful harassment and other inappropriate conduct and harassment. This Policy defines and establishes an **absolute prohibition of harassment of all kinds in the work environment. No form of harassment will be tolerated.**

In addition to giving examples of some forms of inappropriate behavior that could constitute harassment, this Policy establishes ELEVATE's expectations and responsibilities of its supervisory staff with respect to preventing, reporting and investigating harassment.
- e) This Policy prohibits retaliation against anyone reporting harassment or participating in an investigation of such a report.

## 2. Applicability

- a) This Policy applies to all employees and contractors of ELEVATE and is extended to all company stakeholders include clients and suppliers.
- b) This Policy will be applied impartially to all employees regardless of their rank, status, seniority or position within ELEVATE.
- c) This Policy applies to all locations where ELEVATE may host Company Business Events, as defined under Section 4d) below.

### 3. Policy

a) *Zero Tolerance of Harassment and Inappropriate Behavior:*

ELEVATE will not tolerate harassment and inappropriate behavior in the work environment. All forms of harassment, including unlawful or inappropriate sexual harassment and harassment based on race, color, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, disability or veteran status, or any other legally protected factor, are prohibited and will be grounds for appropriate discipline, up to and including termination of employment. In imposing the appropriate discipline, ELEVATE will consider all of the circumstances surrounding the violation of this Policy, including without limitation the severity of the offense.

Harassment is defined as any objectionable or offensive behavior that is known or ought reasonably to be known to be unwelcome. Harassment may be intended or unintended. Inappropriate conduct meant as a joke, a prank, uninvited touching, discriminatory behavior or even a compliment can lead or contribute to harassment.

b) *Zero Tolerance of Retaliation:*

ELEVATE will not tolerate retaliation against any employee for making a complaint of harassment or violation of this Policy, or for reporting inappropriate conduct to ELEVATE or for providing information related to such complaint. Any employee found to have engaged in such retaliation will be subject to appropriate discipline, up to and including termination of employment. In imposing the appropriate discipline, ELEVATE will consider all of the circumstances surrounding the violation of the Policy, including without limitation the severity of the offense.

c) *Investigation of Violations of this Policy:*

ELEVATE will promptly, thoroughly and impartially investigate any observed and reported harassment, and will take such action and impose such discipline as it deems necessary and appropriate to prevent such harassment from continuing.

d) *Discipline:*

Violators of this Policy will be subject to appropriate discipline, considering all facts and circumstances uncovered in the investigation, including without limitation written reprimands, monetary fines, suspensions, demotions and termination of employment.

#### 4. Definitions/Examples

- a) The term “harassment” is any conduct that unreasonably interferes with another employee’s work performance or has the purpose or effect of creating an intimidating, hostile or offensive work environment.
- b) Examples of possible harassment include, but are not limited to:
- Verbal abuse, yelling, and/or making threats
  - Making degrading or offensive comments, gestures, or jokes
  - Spreading malicious gossip or rumors
  - Inappropriate communication through social media, email, or instant messaging
  - Actual or threatened physical contact or assault
  - Bullying or intimidation (e.g. sabotaging work equipment, interfering with someone’s ability to perform their duties, exclusionary practices, etc.)
- c) Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes unwelcome sexual advances, requests for sexual favors, and other verbal, visual, or physical conduct of a sexual nature. Such conduct is unlawful or inappropriate when:
- Submission to the conduct is made a term or condition of employment
  - Submission to or rejection of the conduct is used as the basis for an employment decision affecting an employee, or
  - The conduct has the purpose or effect of unreasonably interfering with an employee’s work performance, or creating an intimidating, hostile, or offensive work environment.
- d) Examples of comments, actions or things that are inappropriate and could constitute unlawful or inappropriate sexual harassment include, but are not limited to:
- Unwelcome sexual flirtations, advances, or propositions
    - Verbal abuse of a sexual nature, statements or questions about personal sexual matters; insults, threats or jokes with sexual connotations: speaking sexually degrading language.
  - Any pressure or requests for sexual favors
    - Unwelcome touching, patting, cornering; brushing up against a person, hugging or grabbing; coercing sexual relations or assault of an individual
  - Sexually-oriented “kidding” or “teasing”, “practical jokes” or jokes about gender-specific traits
  - Display in the workplace of sexually suggestive objects or pictures (including downloading, storing or sharing sexually inappropriate text or images via internet pages, emails or email attachments); sexually explicit or offensive jokes, or other materials containing sexually suggestive content

- Any form of assaulting, impeding or blocking movement, or any physical interference with normal work or movement directed at another individual, or
  - Stories, cartoons, nicknames, and comments of a derogatory or sexual nature.
- e) The “work environment” covered by this Policy extends beyond ELEVATE’s physical office locations and may include Company sponsored off-site meetings, events or conferences, or a client’s office, a restaurant, or other location where Company business is conducted.
- f) The term “retaliation” is defined as any adverse employment action taken against someone for raising potential violations of this Policy, reporting violations and/or participating in investigations.

## 5. Reporting Policy Violations

- a) Any employee, who believes he or she has been the object of, or is aware of an instance of inappropriate behavior, harassment or retaliation, should promptly report the conduct as specified below and remove themselves from the harmful environment. In addition, if an employee observes or experiences any offensive conduct, and believes it is sensible and appropriate and safe to do so, he or she is encouraged to inform the offending party that the behavior is unwelcome and must stop. Often, an offending party may not realize that such behaviors are unwelcome or offensive; sometimes a simple discussion will promptly end the offending conduct. However, employees are not required to raise the offensive conduct with the offending party.
- b) All supervisory and managerial employees have a duty to maintain the work environment free from all forms of harassment, including unlawful or inappropriate sexual harassment. Each supervisor and manager must immediately report any complaint or observation of unlawful or inappropriate harassment or other violation of the Policy to Human Resources.
- c) Employees can report harassment, retaliation or inappropriate behavior through any of the numerous avenues below:
- Senior Vice President of the Business Stream
  - Global Human Resources
  - ELEVATE Helpline: [www.elevate.ethicspoint.com](http://www.elevate.ethicspoint.com)
- d) Note that under this Policy an employee is not required to report violation of this Policy through his/her direct chain of command, but may report such violations to any other person listed above.

## 6. Investigation Process

- a) ELEVATE will determine the appropriate personnel to conduct a prompt, thorough and impartial investigation of any report of harassment, retaliation or inappropriate behavior. Typically, the investigation will be conducted by professionals within Human Resources. However, certain investigations will be conducted by the Senior management or outside investigators.
- b) To the greatest extent possible, all internal investigations shall be handled in the strictest of confidence. A good faith effort will be made to treat such information as confidential within a “need-to-know” context, consistent with the requirement that ELEVATE conduct a thorough investigation.
- c) All phases of the investigation will be documented in accordance with legal and practical guidelines determined by Human Resources.
- d) To the extent practicable and appropriate, ELEVATE will inform employees involved of the progress of the investigation.

## 7. Disciplinary Action for Violations

- a) Where it is determined that a violation of this Policy has occurred, ELEVATE will take appropriate corrective action and impose appropriate discipline. Such corrective action will be determined with regard to the requirement that it be sufficient to discontinue the prohibited conduct. Disciplinary action may range from counselling, training and verbal warning to monetary fines or penalties, salary decrease, job reassignment, suspension or termination of employment. All disciplinary actions should be documented by ELEVATE and placed in the violator’s personnel file.
- b) Employees who engage in harassment will be individually liable for damages to the harassed party. In addition, an employee whose conduct subjects ELEVATE to liability for harassment shall be personally responsible to ELEVATE for all expenses incurred by ELEVATE, including the fees and expenses of litigation, costs, judgements, damages and settlements.

Any questions about this Policy should be directed to the Human Resources Director, Global.

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