

MacLean-Fogg Company Anti-Harassment Policy

REVISED DATE: December 1, 2016

PURPOSE: This policy describes MacLean-Fogg Company's commitment to equal opportunity employment through opposition to harassment of any employee on the basis of race, age, religion, color, national origin, sex, gender or sexual orientation, ancestry, disability, Vietnam Era/Disabled Veterans status or any other legally protected status. Additionally, the policy describes the Company's commitment to establishing clear boundaries between employee personal and business interactions.

The Company is committed to maintaining a work environment that is free of discrimination. In keeping with this commitment, we will not tolerate harassment of Company employees by anyone, including any supervisor, coworker, vendor, client, contractor, customer or other regular visitor of the Company.

SCOPE: This policy applies to MacLean-Fogg Company and all its divisions.

POLICY:**GENERAL HARASSMENT**

Harassment consists of unwelcome conduct, whether verbal, physical, or visual, that is based upon a person's protected status, such as sex, gender, sexual orientation, color, race, ancestry, national origin, genetic information, religion, age, disability, veteran status, or other legally protected group status under applicable federal, state, or local law. The company will not tolerate harassing conduct that affects tangible job benefits, that interferes unreasonably with an individual's work performance, or that creates an intimidating, hostile, or offensive working environment.

SEXUAL HARASSMENT

Sexual harassment deserves special mention. Unwelcome sexual advances, requests for sexual favors, and other physical, verbal or visual conduct based on sex constitute sexual harassment when one or more of the following occurs:

1. submission to the conduct is an explicit or implicit term or condition of employment,
2. submission to or rejection of the conduct is used as the basis for an employment decision, or
3. the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Examples of Prohibited Sexual Harassment

Examples of prohibited sexual harassment include, but are not limited to, the following conduct:

- Denying a qualified individual employment opportunities and benefits that are, instead, awarded to an individual who submits (voluntarily or under coercion) to sexual advances or sexual favors.
- Requiring an individual to submit to unwelcome sexual conduct to receive an employment opportunity or benefits.
- Unwelcome verbal conduct, such as sexual innuendoes, suggestive comments, insults, humor and jokes about sex, anatomy, gender-specific traits, sexual propositions, threats, repeated requests for dates after initial refusal, statements about other employees of a sexual nature, suggestive or insulting sounds, and leering.

- Unwelcome visual conduct, such as sexually suggestive posters, calendars, signs (electronic or otherwise), pin-ups, tattoos and obscene or sexually suggestive gestures.
- Unwelcome physical conduct, such as touching, hugging, kissing, pinching, brushing the body, sexual acts, and/or assault and battery.

REPORTING HARASSMENT

Employees who feel they have been harassed or have witnessed harassment are encouraged to report the harassment to their Supervisor immediately. If the employee's immediate Supervisor is the source of the alleged harassment, the employee should report the problem to local Human Resources, the Department Manager or the Company Helpline.

Supervisors and Managers who receive a harassment complaint must notify their Human Resource Representative, and, in coordination with Human Resources, the complaint will be investigated. The steps undertaken in the investigation will vary depending upon the particular circumstances, but generally may include discussing the allegation with the individuals involved, and questioning all employees who have any knowledge of either the incident in question or similar problems. The complaint along with investigative steps and findings will be completed within one week to the extent reasonably possible, and information relating to the complaint will only be disclosed as necessary to fully investigate the matter and to document it thoroughly. Confidentiality will be maintained with respect to a harassment complaint unless otherwise required under the circumstances; only those with a "need to know" about such a complaint will be advised of its existence.

An employee dissatisfied with the investigation's resolution of a harassment complaint may file a complaint to Corporate Human Resources or the General Manager of the division. The employee will be asked to state the cause of the complaint in writing, and send it directly to Corporate Human Resources or the General Manager. Neither the Company nor any employee of the Company will in any way retaliate against any individual who makes a good faith report under this policy. Retaliation against any such individual is itself a serious violation of this policy and should be reported immediately.

EMPLOYEE DATING

MacLean-Fogg strongly believes that an environment where employees maintain clear boundaries between employee personal and business interactions is most effective for conducting business. Although MacLean-Fogg does not prevent the development of friendships or romantic relationships between coworkers, it does establish very clear



boundaries as to how relationships will progress during working hours and within the working environment.

Individuals in supervisory relationships or other influential roles are subject to more stringent requirements due to their position of authority, their access to sensitive information, their opportunities for collusion and their ability to influence tangible job benefits and work environment.

Application

1. During working time and in working areas, employees are expected to keep personal exchanges limited so that others are not distracted or offended by such exchanges and so that productivity is maintained.
2. During non-working time, such as lunches, breaks and before and after work periods, employees are not precluded from having appropriate personal conversations in non-work areas as long as their conversations and behaviors could in no way be perceived as offensive or uncomfortable to a reasonable person.
3. Employees are prohibited from engaging in physical contact that would be deemed inappropriate by a reasonable person while anywhere on company premises, whether during working hours or not.
4. Personal relationships with coworkers that create a disruption in the work environment will be investigated, and if necessary, will be subject to appropriate disciplinary action, up to and including termination.
5. Employee off-duty conduct is generally regarded as private, as long as such conduct does not create problems within the workplace. An exception to this principle, however, is romantic or sexual relationships between supervisors and subordinates.
6. Supervisors, managers, executives or anyone else in sensitive or influential positions must disclose the existence of any relationship with another coworker that has progressed beyond a platonic friendship. Disclosure may be made to the immediate supervisor or the Human Resources Representative. This disclosure will enable the organization to determine whether any conflict of interest exists because of the relative positions of the individuals involved.
7. The Company will work with the parties involved where problems or potential risks are identified to consider options for resolving the conflict. The initial solution will be to make sure that the parties involved no longer work together on matters where one is able to influence the other or take action for the other.

Matters such as hiring, firing, promotions, performance management, compensation decisions, financial transactions, etc. are examples of situations that may require reallocation of duties to avoid any actual or perceived reward or disadvantage.

8. The provisions of this policy apply regardless of the sexual orientations of the parties involved.
9. Where doubts exist as to the specific meaning of the terms used above, employees should make judgments on the basis of the overall spirit and intent of this policy.

DISCIPLINE

The management of MacLean-Fogg will not tolerate harassment or discrimination of employees in the workplace. If, after a thorough and complete investigation, any employee, including Supervisors and Managers, is found to have violated this policy, that employee will be subject to discipline, up to and including termination of employment.

INVESTIGATION MATERIALS

Information and materials to conduct an investigation are located in Human Resources' Shared Services under *Investigation Forms and Checklist*.

STATEMENT OF COMPLIANCE

Refer to Appendix for Statement of Compliance.

Appendix

STATEMENT OF COMPLIANCE

I, _____, certify that I have received a copy of the MacLean-Fogg Company Anti-Harassment Policy, which sets forth the Company's policy and procedures regarding equal opportunity employment through opposition to harassment of any employee on the basis of race, age, religion, color, national origin, sex, gender, sexual orientation, ancestry, disability, Vietnam Era/Disabled Veterans status or any other legally protected status.

I have been told to read the policy and urged to contact the Human Resources Department if I have any questions.

I understand that:

- My compliance with the policy is a condition of my (continued) employment.
- MacLean-Fogg Company is committed to maintaining a work environment that is free of discrimination.
- The Company will not tolerate harassment of Company employees by anyone, including any supervisor, coworker, vendor, client, contractor, customer or other regular visitor of the Company.
- The Company will not tolerate retaliation against any Company employee who engaged in protected activity (i.e. the filing of a complaint, providing witness testimony or corroboration, or participating in an internal or external investigation of such complaints) by anyone, including any supervisor, coworker, vendor, client, contractor, customer or other regular visitor of the Company.
- I will be subject to appropriate disciplinary action, up to and including termination of employment, and other appropriate conditions as determined by the Company if I violate the policy.

I agree to abide by the terms of the policy.

Employee Printed Name

Date

Employee Signature