

EQUAL EMPLOYMENT OPPORTUNITY

The Company is committed to providing a work environment free of unlawful harassment. The Company policy prohibits sexual harassment and harassment based on race, sex, color, religion or creed, national origin, ethnicity, ancestry, age, pregnancy (including childbirth, breastfeeding, or related medical conditions), physical or mental disability, military status, citizenship status, medical condition (including HIV+ status, genetic information, cancer), marital or dependents status, political affiliation, gender (including sexual orientation, gender identity, and gender expression), receipt of workers' compensation or protected leaves of absence benefits, or any other basis protected by federal, state or local law or ordinance or regulation.

It also prohibits unlawful discrimination based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics. All such discrimination is unlawful.

The Company is committed to compliance with all applicable laws providing equal employment opportunities. This commitment applies to all persons involved in The Company operations and prohibits unlawful discrimination by any employee of The Company, including supervisors and coworkers.

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

Any applicant or employee who requires an accommodation in order to perform the essential functions of the job should contact your supervisor or HR Manager with day-to-day personnel responsibilities and discuss the need for an accommodation. The Company will engage in an interactive process with the employee to identify possible accommodations, if any, which will help the applicant or employee perform the job. If the accommodation is reasonable and will not impose an undue hardship, The Company will make the accommodation.

If you believe you have been subjected to any form of unlawful discrimination follow the complaint handling procedure below. The Company will immediately undertake an effective, thorough, and objective investigation and attempt to resolve the situation.

If The Company determines that unlawful discrimination has occurred, effective remedial action will be taken commensurate with the severity of the offense. Appropriate action also will be taken to deter any future discrimination. The Company will not retaliate against you for filing a complaint and will not knowingly permit retaliation by management employees or your coworkers.

UNLAWFUL HARASSMENT

The Company is committed to providing a work environment free of unlawful harassment. The Company policy prohibits sexual harassment and harassment based on race, sex, color, religion or creed, national origin, ethnicity, ancestry, age, pregnancy (including childbirth or related medical conditions), physical or mental disability, military status, citizenship status, medical condition (including HIV+ status, genetic

information, cancer), marital or dependents status, political affiliation, gender (including sexual orientation, gender identity, and gender expression), receipt of workers' compensation or protected leaves of absence benefits, or any other basis protected by federal, state or local law or ordinance or regulation.

All such harassment is unlawful. The Company's anti-harassment policy applies to all persons involved in the operation of The Company and prohibits unlawful harassment by any employee of The Company, including supervisors and managers, as well as vendors, customers, independent contractors and any other persons. It also prohibits unlawful harassment based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics.

Prohibited unlawful harassment includes, but is not limited to, the following behavior:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations or comments;
- Visual displays such as derogatory and/or sexually-oriented posters, photography, cartoons, drawings or gestures;
- Physical conduct including assault, unwanted touching, intentionally blocking normal movement or interfering with work because of gender, race or any other protected basis;
- Threats and demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss and offers of employment benefits in return for sexual favors;
- Retaliation for reporting or threatening to report harassment; and
- Communication via electronic media of any type that includes any harassing conduct that is prohibited by state and/or federal law, or by The Company policy.

If you believe that you have been unlawfully harassed, follow the complaint handling procedure below. Supervisors will refer all harassment complaints to the HR Manager, investigative officer or the president of The Company. The Company will immediately undertake an effective, thorough and objective investigation of the harassment allegations.

If The Company determines that unlawful harassment has occurred, effective remedial action will be taken in accordance with the circumstances involved. Any employee determined by The Company to be responsible for unlawful harassment will be subject to appropriate disciplinary action, up to, and including termination.

ANTI-RETALIATION

The Company encourages all employees to report any incidents of harassment forbidden by this policy immediately so that complaints can be quickly and fairly resolved. The Company will not retaliate against you for filing a complaint and will not tolerate or permit retaliation by management, employees or co-workers.

You also should be aware that the Federal Equal Employment Opportunity Commission and the California Department of Fair Employment and Housing investigate and prosecute complaints of prohibited harassment in employment. If you think you have been harassed or that you have been

retaliated against for resisting or complaining, you may file a complaint with the appropriate agency. The nearest office is listed in the telephone book.

COMPLAINT HANDLING PROCEDURE

The Company encourages employees to report promptly any incidents of harassment o, unlawful discrimination, or any other conduct of concern, so that corrective action may be taken. If you become aware of an incident of sexual or other harassment or unlawful discrimination, involving you or someone else, report any such incident promptly to your supervisor, manager, or the appropriate person in our Human Resources Department. Supervisors and managers who receive complaints or who observe harassing or other unlawful discriminatory conduct should immediately inform Human Resources or any senior manager so that an appropriate investigation may be initiated.

You are encouraged to raise any work-related concerns informally and openly with management. Please make your concerns known as soon as possible to your manager or Human Resources so an investigation can be completed, if necessary, and a resolution of the situation can be determined.

Complaints will be investigated promptly, with appropriate confidentiality under the circumstances, and follow-up reporting. Information regarding the complaint will only be shared with an individual with a demonstrated "need to know." Any employee or contract worker who is determined to have engaged in sexual or other harassment or unlawful discrimination will be subject to appropriate discipline, up to and including discharge or termination of the engagement. The Company will not tolerate retaliation against any employee or contract worker for making a complaint of harassment or for cooperating in an investigation. The Company will not knowingly permit retaliation by management or co-workers.