

Gebrüder Weiss Policy Against Harassment and Discrimination

Gebrüder Weiss USA has adopted a **zero tolerance policy** towards discrimination and all forms of unlawful harassment. We strive to maintain an atmosphere that is free from illegal discrimination or harassment of any kind, including discrimination or harassment on the basis of an individual's race, color, religion, sex (including pregnancy), age, disability, religion, marital or family status, sexual orientation, national origin, veteran status, status with regard to public assistance, or any other characteristic protected by federal, state or local law.

We have a complaint procedure that employees should follow in the event any employee feels that he or she has been the subject of any type of unlawful harassment, including sexual harassment, or discrimination. Any employee found to have violated this policy will be subject to such disciplinary action as we deem appropriate, up to and including immediate termination of employment. GWUSA also strictly prohibits discrimination or harassment on the basis of an individual's protected activity, such as opposing prohibited discrimination or participating in the complaint process set out in this policy.

Sexual Harassment

It is our policy to maintain a working environment that absolutely prohibits sexual harassment or conduct that might reasonably be perceived as constituting sexual harassment. Sexual harassment includes any unwelcome sexual advances or requests for sexual favors, sexually motivated physical contact, or any verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of an individual's employment, either explicitly or implicitly;
- Submission to or rejection of such conduct by an individual is used as a factor in an employment decision affecting such individual; or
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive environment.

It would be impossible to list all conduct that GWUSA prohibits and would violate this policy, the following are examples of conduct that will face a zero tolerance policy and we absolutely prohibit:

- Unwelcome verbal conduct, which may include sexually oriented comments, jokes or innuendo, suggestive comments, requests for sexual favors, or inappropriate inquiries into personal matters;
- Unwelcome non-verbal conduct, which may include displaying suggestive objects, pictures, or language, or making suggestive or insulting noises or obscene gestures;
- Unwelcome touching, which may include hugs, pats, pinches, kisses or other unnecessary physical contact;
- Indecent exposure;
- Unwelcome sexual advances toward or flirtations with an individual, which may include persisting despite the individual's rejection of the advances;
- Transmitting or forwarding e-mails containing offensive, suggestive or lewd attachments, statements or jokes;
- Uploading or downloading of inappropriate pictures or material onto Company Computer Systems;
- Granting employment benefits or opportunities because of an individual's submission to sexual advances or sexual favors;

- Harassment not of a sexual nature that is directed against an individual because of his or her gender; or
- Retaliating against an employee for making a complaint or participating in an investigation concerning harassment or discrimination.

Complaint Procedure

Employees who believe they have been subject to conduct in violation of this policy must immediately report such to his or her supervisor or to the Human Resources Department. Supervisors must report to the Head Office Human Resources Department immediately.

Also, if an employee witnesses such behavior or misconduct that violates the nature of this policy, they must report it to their immediate supervisor or to the Human Resources Department.

If for any reason you feel uncomfortable approaching your supervisor with this matter or if your supervisor is the person you believe is engaging in the offensive conduct, or in the case that the matter is not being addressed adequately, you should immediately report it to the next level of management or to the Human Resources Department.

Upon receipt of a discrimination or harassment report, GWUSA will investigate and work to resolve all complaints in a confidential, timely, and thorough manner. While complete confidentiality cannot be guaranteed, every attempt will be made to use confidential information in a discreet manner.

Cooperation with any investigation is required of all employees as part of their job responsibilities. Any employee who fails to cooperate in an investigation may be subject to disciplinary action, up to and including termination of employment.

If the investigation of a reported or suspected occurrence of discrimination or harassment reveals that an employee has not engaged in any form of unlawful discrimination or harassment, management will inform both the employee and the complaining party that an investigation has been conducted and that no evidence supports the report or suspicion.

In the event an investigation reveals evidence that unlawful discrimination or harassment has occurred, management will take whatever steps it deems necessary and appropriate to prohibit further acts of discrimination or harassment, up to and including terminating the employment of the offending employee. GWUSA may also seek legal redress, including attorneys' fees and costs, against any employee or other person who causes GWUSA to incur any expense or liability as a result of prohibited behavior.

Disciplinary action, up to and including termination of employment, may also be taken against any employee who witnesses the discrimination or harassment and does not report it as described above, including any manager who fails to report a complaint of discrimination or harassment or who fails to take corrective action after being informed of a hostile work environment or other incident involving harassment.

Conduct in violation of this policy is not within the course and scope of employment of any employee, nor is it the direct consequence of the discharge of one's duties. Accordingly, to the extent applicable by law, Gebrüder Weiss USA reserves the right not to provide a defense or pay damages assessed against employees for conduct in violation of this policy.

Gebrüder Weiss is committed to a work environment in which all individuals are treated with respect and dignity. Each employee has a right to work in a professional and safe atmosphere that promotes equal employment opportunities and strictly prohibits discrimination and harassment. Gebrüder Weiss USA expects all relationships among employees in the office will be business-like and free of bias, prejudice and harassment.

Gebrüder Weiss Policy Against Harassment and Discrimination Acknowledgement Form

I acknowledge that I have received, read, and understood the Gebrüder Weiss Policy Against Harassment and Discrimination. I fully understand that failure to comply with the policy could result in disciplinary action up to and including termination of employment.

Employee Signature

Date

Employee Name (Please Print)