



ROCK ROAD COMPANIES, INC.
SINCE 1913

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Reviewed: January 24, 2024

Sexual and Other Prohibited Harassment Policy

Rock Road Companies, Inc. is committed to providing a work environment that is free of prohibited harassment. As a result, Rock Road maintains a strict policy prohibiting sexual harassment and harassment against any applicant or employees based on any legally-recognized status, including, but not limited to: actual or perceived race (including traits associated with race, such as hair texture and protective hairstyles (e.g., braids, locks and twists)), color, sex (including married women and unmarried mothers), religion, age (40 or older), national origin, ancestry, marital status, protective order status, disability, military status, unfavorable discharge from military service, sexual orientation (including actual or perceived orientation and gender identity), citizenship status or work authorization status, genetic information, ancestry, pregnancy (including childbirth or medical or common conditions related to pregnancy or childbirth, past pregnancy condition and the potential or intention to become pregnant), certain arrest or criminal history records, homelessness (i.e., lack of a permanent mailing address or a mailing address that is a shelter or social services provider), HIV status, use of lawful products outside of work during nonworking hours, or any other status protected by federal, state or local law.

This policy applies to all persons involved in Rock Road's operations, regardless of their position, and prohibits harassing conduct by any employee or other person involved in our operations, including but not limited to, supervisors, managers, and nonsupervisory employees. This policy also protects employees from prohibited harassment by third parties, such as customers, vendors, clients, visitors, or temporary or seasonal workers. If such harassment occurs in the workplace by someone not employed by Rock Road, the procedures in this policy should be followed.

The workplace includes: actual worksites, any setting in which work-related business is being conducted (whether during or after normal business hours), online and electronic interactions with company employees and third parties involved in our operations, company-sponsored events, or company owned/controlled property.

Rock Road Companies, Inc. prohibits unlawful harassment, sexual harassment, and retaliation, as well as such conduct that does not rise to the level of being unlawful. This policy is not designed or intended to limit the Rock Road's authority to discipline or take remedial action for workplace conduct that the Company deems unacceptable, regardless of whether that conduct satisfies the definition of unlawful harassment, sexual harassment, or retaliation.

Sexual Harassment Defined

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal, or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment, even if the individual making the report is not the intended target of such conduct.

Sexual harassment also includes various forms of offensive behavior based on sex. The following is a non-exhaustive list of the types of conduct prohibited by this policy:

- Unwanted sexual advances or propositions (including repeated and unwelcome requests for dates);
- Offers of employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages;
- Verbal conduct: making or using sexually derogatory comments, innuendos, epithets, slurs, sexually explicit jokes, or comments about an individual's body or dress, whistling or making suggestive or insulting sounds;
- Verbal and/or written content of a sexual nature, graphic verbal and/or written sexually degrading commentary about an individual's body or dress, sexually suggestive or obscene letters, notes, invitations, emails, text messages, tweets or other social media postings;
- Physical conduct: unwelcome or inappropriate touching of employees, customers or vendors, physical violence, intimidation, touching, assault or impeding or blocking normal movements;
- Hostile actions taken against an individual because of that individual's legally protected characteristic, such as:
 - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;

- Sabotaging an individual's work; and
- Bullying, yelling, name-calling
- Retaliation for making reports or threatening to report sexual harassment.

Sexual harassment can occur regardless of the gender of the person committing it or the person who is exposed to it. Harassment on the basis of sexual orientation, self-identified gender, perceived gender, or transgender status, are all forms of prohibited sexual harassment.

Other Types of Harassment

Harassment on the basis of any legally protected status is prohibited, including harassment based on: race, color, religion, sex, pregnancy (including lactation, childbirth or related medical conditions), sexual orientation, gender identity, age (40 and over), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), veteran status, citizenship status, uniformed servicemember status or any other status protected by federal, state or local law. Prohibited harassment may include behavior similar to the illustrations above pertaining to sexual harassment. It also includes, but is not limited to:

- Verbal conduct including taunting, jokes, threats, epithets, derogatory comments or slurs based on an individual's protected status;
- Visual and/or written conduct including derogatory posters, photographs, calendars, cartoons, drawings, websites, emails, text messages or gestures based on an individual's protected status; and
- Physical conduct including assault, unwanted touching or blocking normal movement because of an individual's protected status.

Protection Against Retaliation

Retaliation is prohibited against any person by another employee or by Rock Road for using the below complaint procedure, reporting proscribed discrimination, harassment, sexual harassment, objecting to such conduct, or filing, testifying, assisting, or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Individuals who believe they have been subjected to retaliation or believe that another individual has been subjected to retaliation, should report this concern pursuant to the Complaint Procedure set out below. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation prohibited by this policy is

substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken.

Complaint Procedure

Any individual who believes that they or another individual has been subjected to harassment, sexual harassment or retaliation should, as soon as possible, report it to his or her manager, another member of management, or the EEO Officer or Coordinator. Complaints can be made orally or in writing. Employees are not required to report any prohibited conduct to a supervisor or manager who may be hostile, who has engaged in such conduct, who is a close associate of the person who has engaged in such conduct, or with whom the employee is uncomfortable discussing such matters. Any supervisor or manager who receives a complaint of harassment, sexual harassment, or retaliation or receives information about such conduct must immediately report it to the EEO Officer.

Rock Road Companies, Inc.

608-752-8944

Tiffany Adleman, EEO Officer:

tadleman@rockroads.com

Barb Hiser, EEO Coordinator:

bhiser@rockroads.com

Employees are encouraged, but not required, to communicate to the offending person that his/her conduct is offensive and unwelcome. Individuals who observe any behavior directed at others that may violate this policy are encouraged to take reasonable action to defuse such behavior, if possible, such as intervening directly, alerting a supervisor or Human Resources to assist, or making a report under this policy.

In addition to the above, individuals may also file a formal complaint with either of the government agencies set forth in the attached list of State and Federal Compliance Agencies.

Investigation

After a report is received, a fair, timely, thorough, and objective investigation by Rock Road will be undertaken. Rock Road will maintain confidentiality surrounding the investigation to the extent possible, consistent with a thorough and objective investigation, and to the extent permitted or required under applicable law and related information will only be shared with others on a need-to-know basis. The investigation will be documented and tracked. Once the investigation is completed and a determination is made, the complaining party will be advised that the investigation has been completed as soon as practical and may be informed of the resolution, if appropriate. Rock Road expects all employees to fully cooperate with and provide truthful information in any investigation conducted by the Company.

Discipline


If Rock Road determines that this policy has been violated, including in the event that a manager knowingly allows the policy to be violated without reporting it, prompt remedial action will be taken, up to and including termination of employment.

In addition to being subject to discipline for engaging in harassing or sexually harassing conduct themselves, supervisors and managers will be subject to discipline (up to and including termination) for failing to report suspected harassment or sexual harassment, or otherwise knowingly allowing harassment or sexual harassment to continue. Supervisors and managers will also be subject to discipline for engaging in prohibited harassment or retaliation.

Good Faith Reporting

The initiation of a good faith complaint of discrimination, harassment, sexual harassment, or retaliation will not be grounds for disciplinary or other retaliatory action, even if the allegations cannot be substantiated or the employee was mistaken about aspects of the complaint. Any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination.

Signed this 24th day of January, 2024


Tiffany Adleman
EEO Officer

STATE AND FEDERAL GOVERNMENT COMPLIANCE AGENCIES

Equal Rights Division – Department of Workforce Development

Madison Office

210 E. Washington Ave., Rm. A100
Madison, WI 53703
608-266-6860

Milwaukee Office

819 N. 6th Street, Rm. 723
Milwaukee, WI, 53203
414-227-4384

Madison Mailing Address

P.O. Box 8928
Madison, WI 53708-8928

Equal Employment Opportunity Commission

Washington D.C. Office

131 M Street, NE
Fourth Floor, Suite 4NWO2F
Washington, DC 20507
800-669-4000

Milwaukee Area

310 W. Wisconsin Ave., Suite 500
Milwaukee, WI 53203
414-662-3680

Chicago Area

230 S. Dearborn St., Suite 1866
Chicago, IL 60604
312-872-9777

Illinois Department of Human Rights

Chicago Office

555 W. Monroe St., Suite 700
Chicago, IL 60661
312-814-6200

Springfield Office

524 S. 2nd Street, Suite 300
Springfield, IL 62701
217-785-5100