

Reviewed March 12, 2025

Sexual and Other Prohibited Harassment

The Company is committed to providing a work environment that is free of harassment based on any legally Protected Characteristics. As a result, the Company maintains a strict policy prohibiting sexual harassment and harassment against any applicant or employee based on any legally-recognized status, including, but not limited to: 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 or immigration status, uniformed servicemember status or any other status protected by federal, state or local law (collectively, "Protected Characteristics").

The harassment prohibited by this policy applies to conduct by any person involved in our operations, including employees, supervisors, managers, temporary or seasonal workers, agents, clients, vendors, customers, or any other third-party involved in the Company's operations, and this policy specifically prohibits conduct that creates or contributes to a hostile or offensive working environment for any Company employee or applicant based on Protected Characteristics. If such harassment occurs that an employee believes to be a violation of this policy, the procedures set forth in the *Complaint Procedures* in this policy should be followed.

The Company prohibits unlawful harassment and sexual harassment, and prohibits harassing conduct (as defined in this policy) that does not rise to the level of being unlawful. This policy is not designed or intended to limit the Company's authority to discipline or take remedial action for conduct that violates this policy that the Company deems unacceptable, regardless of whether that conduct satisfies the definition of unlawful harassment or sexual harassment.

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 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 or sexual experiences, sexually suggestive or obscene letters, notes, invitations, emails, text messages, tweets or other social media postings;
- Physical conduct: unwelcome or inappropriate touching, physical violence, intimidation, touching, assault or impeding or blocking normal movements;
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity or the status of being transgender, 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;
 - Repeated and intentional use of a name or pronoun inconsistent with an individual's known gender identity;
 - Asking intrusive questions about a person's sexual orientation, gender identity, gender transition, or intimate body parts;
 - Sabotaging an individual's work; and
 - Bullying, yelling, or 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 Prohibited Harassment

Harassment on the basis of any Protected Characteristic is prohibited. Prohibited harassment may include behavior similar to the illustrations above and may also include, but is not limited to:

- Verbal conduct including taunting, jokes, threats, epithets, derogatory comments or slurs based on an individual's Protected Characteristics;
- Visual and/or written conduct including derogatory posters, photographs, calendars, cartoons, drawings, websites, social media, emails, text messages or gestures based on an individual's Protected Characteristics;
- Sharing or watching pornography or sexually demeaning depictions of people, including AI-generated and deepfake images and videos;
- Mimicking or mocking a person's disability, accent, or religious garments, jewelry, or displays; and
- Physical conduct including assault, unwanted touching or blocking normal movement because of an individual's Protected Characteristics.

Protection Against Retaliation

Retaliation is prohibited against any person by another employee or by the Company for using the complaint procedures provided below, reporting prohibited discrimination, harassment, sexual harassment or retaliation, 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* in this policy. 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 Procedures

Any individual who believes that they or another individual has been subjected to discrimination, sexual harassment, any other form of prohibited harassment or retaliation should, as soon as possible, report it to their manager or supervisor, another member of management, or the EEO Officer or Coordinator. Complaints can be made orally or in writing. If any supervisor or another manager is the alleged harasser or otherwise believed to be violating this policy, the employee must report the alleged conduct to the EEO Officer or Coordinator – reporting directly to the offending supervisor directly is not sufficient. 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 discrimination, harassment, sexual harassment, or retaliation or receives information about such conduct must also immediately report it to the EEO Officer or Coordinator.

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Employees are encouraged, but not required, to communicate to the offending person that their 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. Physical confrontation, violence, or assault is not an appropriate method of intervention. The intervening person must act in accordance with the Company's policies.

Investigation

After a report is received, or the Company otherwise has reason to believe discrimination, prohibited discrimination, harassment, including sexual harassment, or retaliation is occurring, a timely, thorough and objective investigation by the Company will be undertaken. The Company 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.

Once the investigation is completed and a determination is made, the complaining party will be advised that the investigation has been completed and may be informed of the resolution. The Company complies with the law in conducting investigations and expects that employees will cooperate with an investigation, except when voluntary compliance with an investigation is being requested. Employees are expected to provide truthful information when participating in an investigation.

Discipline

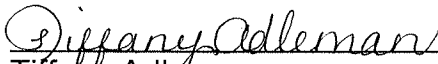
If the Company determines that this policy has been violated, including in the event that a supervisor or manager knowingly allows the policy to be violated without reporting it, prompt remedial action will be taken, up to and including termination of employment.

In addition to being subject to discipline for engaging in discrimination, harassing or sexually harassing conduct, or retaliation themselves, supervisors and managers will be subject to discipline (up to and including termination) for failing to report suspected discrimination, harassment or sexual harassment, or otherwise knowingly allowing discrimination, harassment, or sexual harassment or retaliation to continue. Supervisors and managers will also be subject to discipline for engaging in prohibited discrimination, harassment, including sexual harassment or retaliation. Supervisors and managers must ensure the workplace is safe, supportive, and free from retaliation against those who raise complaints or act as witnesses both during and after any investigation.

Good Faith Reporting

The initiation of a good faith complaint of discrimination, prohibited 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 12th day of March, 2025



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