

ICRW strives to create and maintain a work environment in which people are treated with dignity, decency, and respect. The environment of the organization should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. ICRW does not tolerate or condone any form of discrimination or conduct within the workplace that can reasonably be considered as harassment, including but not limited to physical, personal, discriminatory, psychological, cyberbullying, sexual, or third party harassment or any other type of harassment which contributes to a hostile and toxic work environment whether based on race, color, religion, age, sex, sexual orientation, gender identity or expression, marital status, citizenship, national origin or ancestry, disability or veteran status. Prohibited conduct shall include, among other things, any form of verbal harassment, including derogatory words, remarks or slurs, visual forms of harassment such as markings, cartoons or drawings, and written forms of harassment, including letters and e-mails.

Through enforcement of this policy and by education of employees, ICRW will seek to prevent, correct, and discipline behavior that violates this policy. All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or termination of employment.

Managers and supervisors who knowingly allow or tolerate discrimination, harassment, or retaliation, including the failure to immediately report such misconduct to human resources (HR), are in violation of this policy and subject to discipline.

With respect to sexual harassment, ICRW will not tolerate offensive comments, jokes, and other sexually oriented statements. Similarly, ICRW will not condone or tolerate any unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature that constitutes sexual harassment where:

- A. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- B. submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- C. such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Some examples of sexual harassment include sexual remarks, slurs, sexually offensive posters, e-mails, cartoons, or drawings; physical interference with normal work or movement; or any unwelcome sexual touching or advance.

Reporting Procedure

If you experience and/or witness any job-related harassment or unlawful discrimination based on race, color, age, religion, sex, sexual orientation, gender identity or expression, marital status, citizenship, national origin or ancestry, ethnicity, disability, veteran status, age or other basis protected by applicable federal, state or local law, promptly report the incident to your Supervisor and/or another member of staff whom you feel comfortable sharing with. If you are not comfortable reporting to your supervisor or other staff member, or if your supervisor and/or

other staff member is not responsive, you should report the incident, in writing, to the any or all members of Human Resources. Human Resources will make a prompt, thorough and impartial investigation and take the appropriate corrective action if they determine harassment has occurred in violation of municipal, state, or federal law.

If you prefer to make an anonymous claim, ICRW has contracted an anonymous integrity hotline which is available to all ICRW employees worldwide, including part time, temporary and contract employees. The hotline may be contacted through Website: www.lighthouse-services.com/icrw

All reports will be received by the lighthouse representative and will be shared anonymously with ICRW. Reports will be handled promptly, and confidentially Special privacy safeguards will be applied in handling harassment complaints, under which the privacy of the complaining party and the person accused of harassment, will be held in confidence to the extent possible. We will retain as confidential, to the extent possible, all documentation of allegations and investigations.

ICRW may take corrective action against the offending employee, including disciplinary measures up to and including discharge, to remedy any violation of this policy.

ICRW prohibits any form of retaliation against any employee for filing a complaint under this policy, or for assisting in a complaint investigation.

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If after investigating any complaint of harassment or unlawful discrimination, ICRW determines that the employee has willfully provided false information, ICRW may take disciplinary action up to and including discharge against the individual who filed the report or purposefully and willfully gave false information.