

EQUAL EMPLOYMENT OPPORTUNITY AND HARASSMENT

Purpose

The Company recruits and hires diverse individuals whose qualifications, abilities and interests most closely match our current employment needs. It is also committed to providing a work environment free of discrimination and harassment.

The purpose of this policy is to set forth the Company's expectations regarding behavior of associates when interacting with other associates and the Company's customers and business partners.

Policy

The Company is committed to providing equal employment opportunity for all individuals and following employment practices designed to prevent illegal discrimination. This means that it will strive to hire and promote individuals and to administer all human resources actions without regard to race, color, creed, religion, national origin, sex, gender identity, sexual orientation, disabilities of otherwise qualified individuals, age, marital status, veteran status, status relating to public assistance, genetic information, and other characteristics as required by law. It is also the Company's policy to provide a work environment that is free from any form of illegal harassment.

Harassment is unwelcome behavior based on a legally protected characteristic, including, but not limited to, verbal or physical conduct that creates a hostile or intimidating environment or interferes with an individual's work performance, employment opportunities or other privileges of employment. Sexual harassment includes unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature. Illegal harassment can be based upon conduct by a co-worker, temporary associate, contractor, supervisor, vendor, customer or supplier. Examples of such behavior include:

- Telling jokes that are racist, sexist or otherwise offensive due to national origin or disability;
- Making offensive, derogatory or degrading remarks about gender, race, ancestry, religion, national origin, age, sexual orientation or disability;
- Sending offensive or derogatory e-mail messages;
- Unwanted physical contact, advances or propositions;
- Unwanted staring or leering;
- The display of sexually suggestive objects or pictures; and
- Any other behavior that creates a hostile or intimidating work environment.

To comply with the Company's commitment to equal employment opportunity and policies against discrimination and harassment, you should not discriminate against any associate, customer or employee of any business partner of the Company on the basis of a legally protected characteristic, including but not limited to their race, color, creed, religion, national origin, sex, gender identity, sexual orientation, disability, age, marital status, veteran status, or status relating to public assistance. When

making employment related decisions regarding individuals or groups of persons, these factors cannot be taken into account.

You are also expected to refrain from engaging in any activity that constitutes harassment based on a legally protected characteristic of associates, independent contractors, or any person with whom the Company does business.

You should report any inappropriate or harassing behavior, whether it is directed at you or any other associate, to your immediate supervisor, a higher level of management in your organization or your local Human Resources Department. If you are uncomfortable with those approaches and/or wish to remain anonymous, please call the Company's toll-free Associate Hotline at:



Effective Date: November 21, 2009