



## Discrimination, Harassment & Retaliation Prevention Policy

### Introduction

Everforth, Inc. and its subsidiaries (the “Company”) is committed to providing a work environment that is free of illegal discrimination and harassment. As a result, the Company maintains a strict policy prohibiting sexual harassment and harassment against applicants and employees based on any legally-protected basis, including, but not limited to actual or perceived race, color, creed, religion (including religious dress and grooming practice), national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, lactation, or related medical conditions), gender identity and gender expression (including transgender status), sexual orientation, registered domestic partner status, marital status, status as a crime victim, military service and veteran status, political affiliation, union membership, disability, protected medical condition as defined by applicable state or local law, genetic information or any other characteristic protected by applicable federal, state, or local laws and ordinances. All such harassment is prohibited.

This anti-harassment policy applies to all persons involved in our operations and prohibits harassing conduct by any employee of the Company, including nonsupervisory employees, supervisors and managers. This policy also protects employees from prohibited harassment by third parties, such as vendors, clients, or temporary or seasonal workers. If such harassment occurs on the job, whether by someone employed or not employed by the Company, the procedures in this policy should be followed. Note that the terms “workplace” and “work environment” are not limited only to a physical location an employee is assigned to perform their duties, but also extends to conduct that occurs remotely via electronic means.

### 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.

Sexual harassment also includes various forms of offensive behavior based on sex. The following is a partial list:

- Unwanted sexual advances.
- Offering 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 derogatory comments, epithets, slurs, sexually explicit jokes, or comments about an employee's body or dress.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, notes, or invitations.
- Physical conduct: touching, assault, impeding, or blocking movements.
- Retaliation for making reports or threatening to report sexual harassment.

### **Other Types of Harassment**

Harassment on the basis of any legally protected classification is prohibited. Prohibited harassment may include conduct such as

- Verbal conduct including threats, epithets, derogatory comments, or slurs based on an individual's protected classification;
- Visual conduct including derogatory posters, photography, cartoons, drawings, or gestures based on protected classification; and
- Physical conduct including assault, unwanted touching, or blocking normal movement because of an individual's protected status.

### **Complaint Procedure**

Any employee who believes that they have been subjected to prohibited harassment, discrimination, or retaliation by a co-worker, supervisor, agent, client, vendor, or customer of the Company, or who is aware of such harassment, discrimination, or retaliation of others, should immediately provide a written or verbal report to their supervisor, any other member of management, or to Human Resources at [hr.requests@everforth.com](mailto:hr.requests@everforth.com) or 866-790-2739.

After a report is received, a thorough and objective investigation by management will be undertaken. The investigation will be completed and a determination made and communicated to the employee as soon as practical. If a complaint of prohibited harassment or discrimination is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken.



While it is not possible to guarantee total confidentiality, the Company will try to keep the matter confidential to the extent possible consistent with its legal obligations to follow up on complaints, including investigation, remedial action, and if required, reporting to appropriate enforcement agencies.

The Equal Employment Opportunity Commission ("EEOC") and equivalent state agencies will accept and investigate charges of unlawful discrimination and harassment at no charge to the complaining party. The nearest office of the EEOC and equivalent state agencies can be found in your local telephone directory or online. Additional information regarding anti-harassment laws and your local EEOC offices may be found in your state supplement, if applicable.

### **Protection Against Retaliation**

Retaliation is prohibited against any person by another employee or by the Company for using this complaint procedure, reporting proscribed harassment or discrimination, 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.

An employee should report any retaliation to their supervisor, any management team member, or Human Resources. Employees can contact Human Resources to report such incidents. 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.

### **HR Contact Information**

Hotline: 866-790-2739

Email: [hr.requests@everforth.com](mailto:hr.requests@everforth.com)



**DISCRIMINATION, HARASSMENT & RETALIATION COMPLAINT FORM**

If you believe that you have been subjected to conduct in violation of the Company’s Discrimination, Harassment & Retaliation Prevention Policy, including any applicable state supplement, you are encouraged to complete this form and submit it to Human Resources at the email address for your division listed in the policy. If you are more comfortable reporting verbally or in another manner, you may do so and can follow the guidelines set forth in the Company policy. You will not be retaliated against for filing a complaint. Once a complaint is received, the Company will follow the investigation process described in our policy.

**General Information**

Your Name / Job Title: \_\_\_\_\_

Your Department / Supervisor: \_\_\_\_\_

Preferred Communication Method (if via e-mail or phone, please provide contact info):

\_\_\_\_\_  
\_\_\_\_\_

**Complaint Information**

Please tell us who you believe has violated our Discrimination, Harassment & Retaliation Prevention Policy. What is their relationship to you (e.g., Supervisor, Subordinate, Co-Worker, Other):

\_\_\_\_\_  
\_\_\_\_\_

Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_



Please provide specific date(s) the alleged misconduct occurred. Additionally, please advise if the alleged misconduct is continuing?

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Please list the name and contact information of any witnesses or individuals who may have information related to your complaint.

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*This last question is optional, but may help the investigation*

Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

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Signature: \_\_\_\_\_

Date: \_\_\_\_\_