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I. Policy Statement

The Company is committed to providing a professional work environment where individuals are treated with respect and dignity. As a result, the Company does not and will not tolerate harassment, discrimination or other inappropriate actions, words, jokes, pictures, gestures or comments related to an individual's gender/sex (including sexual harassment), race, color, religion, gender/sex, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, citizenship, status as a covered veteran, pregnancy, childbirth, or related medical conditions including lactation, or any other protected status in accordance with applicable federal, state and local laws.

This policy covers not only conduct by and between employees but also between employees and third parties such as vendors, customers and others who enter the Company's workplace or for whom the Company provides services irrespective of the location for such services.

II. Guidelines


- A. Inappropriate conduct in violation of this policy (including harassment) includes verbal, non-verbal or physical conduct that degrades or shows hostility or dislike toward an individual because of his/her race, color, religion, gender/sex, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, citizenship, status as a covered veteran, pregnancy, childbirth, or related medical conditions including lactation, or any other protected status in accordance with applicable federal, state and local laws, and that (i) has the purpose or effect of creating an intimidating, hostile, or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities. Although this is not a complete listing of behaviors that may be considered inappropriate, the following are examples that may be helpful in identifying such inappropriate behavior:
1. Verbal: epithets, slurs, degrading jokes or negative stereotyping;
 2. Non-verbal: placement, distribution or discussion of any written or printed material that ridicules, degrades, insults, belittles, or shows hostility or aversion toward the protected characteristic(s) of an individual or group;
 3. Physical: threatening, intimidating, abusive or hostile acts based on protected characteristics of an individual or group.

All such behavior, or any other inappropriate conduct, as determined solely by the Company, even if made as a joke, is a violation of this policy and is prohibited.

- B. For the purposes of this policy sexual harassment is defined, as found in the Equal Employment Opportunity Commission Guidelines, as:
- Submission to or cooperation with the conduct is explicitly or implicitly made a term or condition of the individual's employment;
 - Submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual; or
 - Such conduct has the purpose or effect of substantially interfering with the individual's work performance or creating an intimidating, hostile, or offensive work environment.


Sexual harassment may include subtle and/or overt behaviors and may be committed by individuals of the same or different gender. Although this is not an exhaustive listing of behaviors that may be considered sexual harassment, the following are examples that may be helpful in identifying such inappropriate behavior:

1. Verbal: unwanted sexual advances or requests for sexual favors; sexual jokes or innuendos; commentary about an individual's body, sexual prowess or sexual

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deficiencies; suggestive comments, insults, humor, abuse, threats and/or jokes about sex or gender-specific traits;

2. Non-verbal: suggestive or insulting sounds; catcalls; leering; whistling; obscene gestures; and/or display or examination in the workplace of posters or other materials of a sexual nature;
 3. Physical: touching; pinching; groping; brushing up against; coerced sexual relations; and/or assault.
- C. The Company prohibits not only sexual harassment but also any type of harassment based on an individual's protected characteristic(s) under applicable law, such as race, color, religion, gender/sex, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, citizenship, status as a covered veteran, pregnancy, childbirth, or related medical conditions including lactation, or any other protected status in accordance with applicable federal, state and local laws.
- D. Employees must be sensitive to the perception of others related to their behavior. What one person considers appropriate may be offensive to another. Inappropriate conduct, as determined by TMEiC, whether or not it rises to the level of harassment or discrimination under applicable laws, will not be tolerated.
- E. Violation of this policy by an employee is considered a serious form of employee misconduct. Disciplinary action, up to and including termination, may be taken against any employee engaging in any type of behavior in violation of this policy. The Company may take action against any third-party individual or organization engaging in any type of behavior in violation of this policy, including prohibiting the third party from doing business with the Company.
- F. Any employee, including a supervisor or manager, who has knowledge of such behavior yet takes no action to resolve the problem or report it to the Human Resources Department is also subject to disciplinary action.
- G. Any individual who believes that he or she or someone with whom he or she works or for whom he or she performs services is a victim of harassment, discrimination or other inappropriate conduct should take one or all of the following actions:
1. Inform the offending individual that the conduct is offensive and must stop.
 2. Report the conduct to his or her manager.
 3. If the employee feels uncomfortable talking to his or her manager, contact the Vice President, Human Resources, Human Resources Director, any member of the Human Resources Department, or any officer of the Company.
- H. Any member of management receiving a complaint or having knowledge that a violation of this policy has occurred is required to inform the Human Resources Department or the President of the Company if the offending employee is a member of the Human Resources Department.
- I. The Company will investigate all complaints of a violation of this policy and will take appropriate action as necessary. Confidentiality will be maintained as practicable in that, for example, only people with a need to know will be apprised of the nature and substance of the allegations.

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- J. The Company will not take action against any individual who, based on a good faith belief that such conditions exist, makes an allegation of conduct which is in violation of this policy.

- K. Retaliation against individuals for reporting a violation of this policy or for participating in an investigation of a claim of a violation of this policy will not be tolerated. Appropriate disciplinary action will be taken if retaliation occurs.

- L. For more information on this policy, please contact the Human Resources Department.

For any issues related to the topic of this policy, including those not covered in this policy, contact the Policy Administrator for direction and/or approval. Only the Policy Administrator can approve exceptions to this policy, not specifically addressed above.

As with all policies, procedures, practices, and instructions, failure to adhere to this policy may result in administrative action, such as, but not limited to, restrictions or loss of privileges, and/or disciplinary action, up to and including termination.

Policy Administrator	HRVP
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Effective Date	Summary of Changes	Revised by
22-Apr-2009	Expansion of harassment provisions	HRM
01-Aug-2015	Expansion of protected classes	HRD
01-Jul-2020	Expansion of protected classes per Virginia Labor Code	HRVP
20-Sep-2021	Company name reference	HRVP