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SOLENIS POLICY

Anti-harassment

1.0 Policy

Solenis is committed to maintaining a work environment where people are treated with respect. In keeping with this commitment, Solenis will not tolerate the harassment of or by employees, applicants or others, including any supervisor, co-worker or non-employee.

It is Solenis' goal to ensure that behavior never rises to the level of unlawful behavior. Accordingly, this policy prohibits behavior that is not consistent with the workplace Solenis expects, even though it may not rise to the level of unlawful harassment, discrimination or retaliation.

1.1 Definition of harassment

Harassment consists of unwelcome or vexatious conduct, whether verbal, non-verbal or physical, that is based on a person's actual or perceived age, disability, gender, national origin, race, color, religion, sexual orientation, pregnancy, veteran status, genetic information or other category protected by law, and that affects an individual's employment or creates an intimidating, hostile, abusive or offensive working environment.

1.2 Definition of sexual harassment

Sexual harassment is a type of gender-based discrimination that includes, but is not limited to:

- making unwelcome sexual advances or requests for sexual favors or other verbal or physical conduct of a sexual nature as a condition of an employee's continued employment or advancement within the organization;
- making submission to or rejection of such conduct the basis for employment decisions affecting the employee; or
- engaging in offensive, abusive or threatening behavior that interferes with an individual's work performance or creates an intimidating, hostile, abusive or offensive working environment.

Conduct prohibited by this policy need not be motivated by sexual desire and includes gender-based harassment of a person of the same sex. Sexual harassment also includes engaging in a course of vexatious commentary or conduct against an employee in the workplace because of sex, sexual orientation, gender identity or gender expression where the course of comment or conduct is known or reasonably should be known to be unwelcome.

1.3 Examples of harassing behavior

Harassing behavior can be verbal, nonverbal, or physical. Examples of inappropriate behaviors include, but are not limited to:

- ▽ **Verbal** – sexual innuendo, suggestive or discriminatory comments, insults, threats, jokes about personal or physical traits, jokes of a sexual or demeaning nature, or sexual propositions.
- ▽ **Nonverbal** – suggestive or insulting noises, leering, whistling, obscene gestures, threatening gestures, and the posting or possession at the workplace of literature, calendars or pictures that are suggestive, revealing, demeaning or pornographic.
- ▽ **Physical** – unwelcome touching, pinching, brushing, rubbing or groping of the body, unnecessary closeness, threatening or intimidating actions, coercing sexual activity, and assault.

1.3.1 Examples of situations to avoid:

- using belittling nicknames, even in humor
- insults
- bullying
- verbal aggressions
- discriminatory or racist comments
- criticizing an employee in a public area or in an open space, with intention to humiliate or alienate the employee from coworkers
- isolating or denying someone's presence
- belittling or trivializing someone's thoughts
- opposing or challenging everything someone says
- intolerance toward religious holidays, customs or traditions
- discrediting or spreading rumors about the victim.

1.4 Workplace relationships

A supervisor may not date or have any form of sexual relationship with an employee who reports through his or her management chain, even when the relationship is consensual. Activity of this sort will subject all involved to disciplinary action, up to and including termination.

1.5 Reporting a problem

It is every employee's responsibility to help maintain a work environment free from harassment. Employees who believe they have experienced or observed harassment must report the harassment immediately to their supervisor, their human resources representative, the Office of Ethics and Compliance and/or via Share Your Concern page on the intranet.

Each complaint will be investigated on a priority basis, with the investigation generally coordinated by the local human resources department, pursuant to Solenis' Investigations policy. Although Solenis must collect all relevant information as part of a complete investigation, every effort will be made to conduct the investigation on a confidential basis, with disclosure made only where required to conduct the investigation and/or implement any corrective action. If an investigation

confirms that harassment has occurred, Solenis will take prompt corrective action, including discipline up to and including termination. Decisions reached will, as appropriate, be communicated to those involved.

1.6 Retaliation is prohibited

Solenis encourages employees to raise questions or concerns regarding discrimination or harassment with their local Human Resources department. In accordance with the [Reporting policy](#), Solenis will not authorize or permit any form of retaliation against any employee who has made a good faith claim or report of harassment or who in good faith has provided information to Solenis during the investigation of a claim or report of harassment. Employees who believe that they have been retaliated against should immediately contact their supervisor, their Human Resources representative, the Office of Ethics and Compliance and/or via Share Your Concern page on the intranet.

2.0 Scope

Nothing in this policy is intended to create a contract of employment. This policy applies to all Solenis employees, vendors, contractors and consultants, with the exception of the employees who are subject to a collective bargaining agreement, to the extent the agreement contains provisions that conflict with this policy

3.0 Owner

Solenis' Chief Human Resources and Communications Officer is responsible for implementation of and amendments to, this policy.

4.0 Exceptions

There are no exceptions to this policy.