



**SCHLEIFRING**

**Schleifring North America, LLC**  
**Anti-Harassment and Anti-Workplace**  
**Violence Policy**

Version 2.0, dated 2022.09.01

## **1.0 Definitions**

Schleifring North America, LLC is referred to as “SNA” or “the Company”

“Harassment” is defined as any unwelcome conduct that is based on race, color, religion, sex (including sexual orientation, gender identity, or pregnancy), national origin, older age (beginning at age 40), disability, or genetic information (including family medical history). Harassment becomes unlawful where 1) enduring the offensive conduct becomes a condition of continued employment, or 2) the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive. Harassment is not determined by the person who is doing the unwelcome conduct, but by the receiver of the unwelcome conduct.

## **2.0 Reference Documents**

Employee Handbook

Code of Ethics & Standards of Conduct

## **3.0 Policy against Workplace Harassment**

SNA has a strict policy against workplace Harassment. All forms of Harassment of, or by, employees, vendors, visitors, customers, and clients are strictly prohibited and will not be tolerated.

### **3.1 Sexual Harassment**

Sexual Harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment (2) submission to, or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual or (3) 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.

While it is not possible to identify each and every act that constitutes or may constitute sexual Harassment, the following are some examples of sexual Harassment: (a) unwelcome requests for sexual favors; (b) lewd or derogatory comments or jokes; (c) comments regarding sexual behavior or the body of another person; (d) sexual innuendo and other vocal activity such as catcalls or whistles; (e) obscene letters, notes, emails, invitations, photographs, cartoons, articles, or other written or pictorial materials of a sexual nature; (f) repeated requests for dates after being informed that interest is unwelcome; (g) retaliating against an employee for refusing a sexual advance or reporting an incident of possible sexual Harassment to SNA or any government agency; (h) offering or providing favors or employment benefits such as promotions, favorable evaluations, favorable assigned duties or shifts, etc., in exchange for sexual favors; and (i) any physical touching or assaults, or blocking or impeding movements.

### **3.2 Other Harassment**

Other workplace Harassment is often verbal or physical conduct that insults or shows hostility or aversion towards an individual because of the individual's sex, pregnancy (including childbirth, lactation, and related medical conditions), gender, race, religion, color, national origin, physical or mental disability, marital status, age, sexual orientation, or any other status protected by Federal, State, or local laws.

Again, while it is not possible to list all the circumstances that may constitute other forms of workplace Harassment, the following are some examples of conduct that may constitute workplace Harassment: (a) the use of disparaging or abusive words or phrases, slurs, negative stereotyping, or threatening, intimidating or hostile acts that relate to the above protected categories; (b) written or graphic material that insults, stereotypes or shows aversion or hostility towards an individual or group because of one of the above protected categories and that is placed on walls, bulletin boards, email, voicemail, or elsewhere on the Company's premises, or circulated in the workplace; and (c) a display of symbols, slogans, or items that are associated with hate or intolerance towards any select group.

Regardless of the type of Harassment, it is important to remember that it is the receiver or object of the Harassment who determines whether they are being harassed. Sometimes innocent comments that the person who makes the comment believes is just "an innocent comment" can be viewed by another person as Harassment. This is also true of pictures.

## **4.0 Procedures regarding Workplace Harassment**

### **4.1 Reporting Discrimination and Harassment**

Any employee who feels that he or she has witnessed, or been subject to, any form of discrimination or Harassment is required to immediately notify their Supervisor, Senior Management, Human Resources, or email the [ethics@schleifringna.com](mailto:ethics@schleifringna.com) mailbox.

The Company prohibits retaliation against any employee who, based on a reasonable belief, provides information about, complains, or assists in the investigation of any complaint of Harassment or discrimination.

SNA will promptly and thoroughly investigate any claim and take appropriate action where we find a claim has merit. Discipline for violation of this Policy may include, but is not limited to, reprimand, suspension, demotion, transfer, and discharge. If the Company determines that Harassment or discrimination occurred, corrective action will be taken to effectively end the Harassment. As necessary, the Company may monitor any incident of Harassment or discrimination to assure the inappropriate behavior has stopped. In all cases, the Company will follow up as necessary to ensure no retaliation for making a complaint or cooperating with an investigation.

Remember, a failure to report any type of discrimination or Harassment is also subject to disciplinary action.

## **5.0 Policy against Workplace Violence**

As the safety and security of our employees, vendors, contractors, and the general public is in the best interests of SNA, we are committed to working with our employees to provide a safe work environment free from violence, intimidation, and other disruptive behavior. The purpose of this Policy is to minimize the risk of personal injury to employees and damage to Company and personal property.

We do not expect you to become an expert in psychology or to physically subdue a threatening or violent individual. Indeed, we specifically discourage you from engaging in any physical confrontation with a violent or potentially violent individual. However, we do expect and encourage you to exercise reasonable judgment in identifying potentially dangerous situations.

Experts in the mental health profession state that prior to engaging in acts of violence, troubled individuals often exhibit one or more of the following behaviors or signs: over-resentment, anger and hostility; extreme agitation; making ominous threats such as bad things will happen to a particular person, or a catastrophic event will occur; sudden and significant decline in work performance; irresponsible, irrational, intimidating, aggressive or otherwise inappropriate behavior; reacting to questions with an antagonistic or overtly negative attitude; discussing weapons and their use, and/or brandishing weapons in the workplace; overreacting or reacting harshly to changes in company policies and procedures; personality conflicts with co-workers; obsession with a co-worker or Supervisor; attempts to sabotage the work or equipment of a co-worker; blaming others for mistakes and circumstances; demonstrating a propensity to behave and react irrationally.

### **5.1 Zero Tolerance Policy**

The Company has a zero-tolerance policy regarding workplace violence and will not tolerate acts or threats of violence, Harassment, intimidation, and other disruptive behavior, either physical or verbal, that occurs in the workplace or other areas. This applies to Management, co-workers, employees, and non-employees such as contractors, customers, and visitors.

Workplace violence can include oral or written statements, gestures, or expressions that communicate a direct or indirect threat of physical harm, damage to property, or any intentional behavior that may cause a person to feel threatened.

### **5.2 Prohibited Conduct**

Prohibited conduct includes, but is not limited to:

- Physically injuring another person.
- Threatening to injure a person or damage property by any means, including verbal, written, direct, indirect, or electronic means.
- Taking any action to place a person in reasonable fear of imminent harm or offensive contact.
- Possessing, brandishing, or using a firearm or any weapon on Company property or while performing Company business .

- Violating a restraining order, order of protection, injunction against Harrassment, or other court order.

## **6.0 Procedures regarding Workplace Violence**

### **6.1 Reporting Incidents of Violence**

Report to your Supervisor, Senior Management, Human Resources, or email the [ethics@schleifringna.com](mailto:ethics@schleifringna.com) mailbox in accordance with this Policy, any behavior that compromises the Company's ability to maintain a safe work environment. You must report any incident of potential workplace violence, regardless of whether you are the victim or merely a bystander. The failure to report in both instances may lead to disciplinary action. All reports will be investigated immediately and kept confidential, except where there is a legitimate need to know. You are required to cooperate in any investigation of workplace violence.

### **6.2 Violations**

Violating this Policy may subject you to criminal charges as well as discipline up to and including immediate termination of employment.

### **6.3 Retaliation**

Victims and witnesses of workplace violence will not be retaliated against in any manner for reporting. In addition, you will not be subject to discipline for, based on a reasonable belief, reporting a threat, or for cooperating in an investigation.

If you initiate, participate, are involved in retaliation, or obstruct an investigation into conduct prohibited by this Policy, you will be subject to discipline, up to and including termination.

If you believe you have been wrongfully retaliated against, immediately report the matter to Human Resources.

## **7.0 References**

Title VII of the Civil Rights Act of 1964, as amended (29 CFR §§1604, 1605, 1606, 1608.)

Age Discrimination in Employment Act of 1967, (ADEA), as amended (29 CFR §§1625, 1626)

Americans with Disabilities Act of 1990, (ADA), as amended (29 CFR §§1630, 1635, 1640, 1641)

(Note that the Referenced Regulations are not exhaustive, but contain the essence of the particular statute.)

## 8.0 Revision History

<b>Revision</b>	<b>Description of Change</b>	<b>Reason for Change</b>	<b>Document Owner</b>	<b>Date</b>
2.0	Major rewrite	Include Anti-Harassment and Anti-Workplace Violence	Human Resources Department	09-01-2022