M3 USA has long been committed to treating people as our most important asset and maintaining a work environment that is free of discrimination and harassment on the basis of any legally protected status. Accordingly, M3 USA will not tolerate any form of discrimination or harassment by or against anyone, including M3 USA Employees, vendors, contractors, partners, or clients. All M3 USA Employees are expected to maintain the highest standards of conduct and to avoid any behavior or conduct that could be interpreted as discrimination or harassment. Any behavior that creates an intimidating, offensive, abusive or hostile work environment, or that otherwise interferes with any Employee’s ability to perform his or her job is unacceptable and may result in disciplinary action, up to and including immediate discharge from employment. As part of M3 USA’s commitment to providing an environment free from any form of illegal discrimination and harassment, this policy is widely disseminated throughout the Company. Additionally, supervisors will receive periodic training regarding harassment and this policy.

The conduct prohibited by this policy includes all unwelcome conduct, whether verbal, physical, or visual, that is based upon a person’s protected status, such as veteran status, uniformed service member status, race, color, national origin, ancestry, religion, sex (including pregnancy, childbirth, and related medical conditions), disability, age, citizenship status, genetic information, or any other protected group status as determined by federal, state, or local legislation.

Sexual harassment is a problem that needs to be addressed in additional detail. Unwelcome sexual advances, requests for sexual favors and other verbal, physical or visual conduct based on sex constitute harassment when (1) submission to the conduct is made as a condition of employment, (2) submission to or rejection of the conduct is used as a basis for an employment decision, or (3) the conduct creates an intimidating, hostile or offensive working environment.

Sexual harassment includes conduct based on sex, whether directed towards a person of the opposite or same sex. Sexual harassment is not limited to conduct by a supervisor, but can occur between people of any level of responsibility. Sexual harassment is also not limited to explicit demands for sexual favors. It also may include, but is not limited to, such actions as (1) sexually-oriented verbal kidding, teasing or jokes; (2) repeated sexual flirtations, advances or propositions; (3) continued or repeated verbal abuse of a sexual nature; (4) graphic or degrading comments about an individual or his or her appearance; (5) the display or presentation of sexually suggestive objects or pictures; (6) subtle pressure for sexual activity; and (7) physical contact such as patting, hugging, pinching, or brushing against another person’s body. Harassment can occur even when the remark or conduct is not directed at the specific person, but the person overhears or is offended by the remark or conduct directed to someone else. Any type of sexual harassment is against corporate policy and may be unlawful.
The conduct forbidden by this policy includes conduct in any form including but not limited to e-mail, voicemail, chat rooms, internet use, text messages, pictures, images, writings, words, or gestures. Examples of harassment include, but are not limited to:

- Written or verbal abuse or threats;
- Unwelcome remarks, jokes, epithets, slurs or taunting of a discriminatory nature;
- Practical jokes that embarrass or insult someone;
- Negative stereotyping, or intimidating acts that are based on a person’s protected status;
- Ignoring, isolating or segregating a person because of a personal characteristic or religious belief;
- Materials that are of a discriminatory nature that are displayed publicly, circulated in the workplace, etc.;
- The dissemination, sharing or display of emails, websites or images from the Internet that include content of an inappropriate, explicit, harassing or discriminatory nature; or
- Unwelcome sexual advances, request for sexual favors or physical conduct of a sexual nature which may include, but is not limited to, when:
  - Submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment.
  - Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals.
  - Such conduct has the purpose or effect or substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Additionally, the Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by law. To comply with this law, we are asking that you not provide any genetic information when responding to any request from M3 USA. “Genetic information,” as defined by GINA, includes an individual’s family medical history, the results of an individual’s or family member’s genetic tests, the fact than an individual or an individual’s family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual’s family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

Reporting Harassment or Discrimination

All M3 USA Employees are also expected to make it known promptly whenever they believe that they have experienced or witnessed offensive behavior or conduct. If you experience or witness any conduct that you feel may be inconsistent with this policy, tell the harasser that you find his or her conduct offensive and to stop the harassment or discrimination. If you do not feel comfortable telling the person to stop, or the person does not stop the inappropriate conduct, M3 USA requires you to notify the Human Resources Department at x126, your local executive, or your immediate supervisor. If an Employee makes a report to any of these members of management and the manager either does not respond or does not respond in a manner the Employee deems satisfactory or consistent with the policy, the Employee is encouraged to report the situation to one of the other members of management designated in this policy to receive complaints. Please take every step you can to make sure that your concern is known to management. Mere documentation of offending behavior or only confiding in a co-worker, without more, is insufficient to prevent inappropriate conduct from occurring again. Inappropriate behavior must be reported to management so that M3 USA has an opportunity to stop the offending behavior and take appropriate corrective action. Management who knew about a violation of
this policy and took no action to investigate and correct such conduct will be subject to disciplinary action, up to and including immediate discharge from employment.

All reports that you make will be fully investigated and the Company will preserve confidentiality to the extent the needs of the investigation permit. Every Employee is expected to cooperate fully with every investigation. If a complaint is found to have merit, the Company will take whatever corrective action may be warranted, including disciplinary action, up to and including immediate discharge from employment. Additionally, individuals who are found guilty of harassment may be held personally liable for monetary damages and may be required to pay for their own attorneys’ fees. In investigating complaints under this policy, M3 USA may impose discipline for inappropriate conduct that comes to M3 USA’s attention, without regard to whether the conduct constitutes a violation of law or even a violation of this policy.

Any Employee who in good faith reports perceived harassment or discrimination, assists in making a complaint under this policy, or cooperates in the investigation of a complaint has the Company’s assurance that no reprisals, harassment, discrimination or retaliation will be taken as a result of a complaint. If you feel you have been retaliated against, you are to notify the Human Resources Department at x126, your local executive, or your immediate supervisor. M3 USA may take disciplinary action, up to and including termination, if any Employee is found to have harassed or retaliated against another Employee for bringing forward a good faith concern under this policy. It is our policy to encourage discussion of the matter and to help protect others from being subjected to similar inappropriate behavior.

If you have any questions concerning this policy, please contact the Human Resources Manager.

I have read and understand the Harassment Free Workplace Policy and agree to comply with it.

Name

Signature

Date