Policy Against Harassment
Excerpted from the IBB Handbook, Updated May 2014

The Company has a policy of zero tolerance regarding any form of unlawful harassment. We are committed to providing a workplace free from unlawful harassment. It is illegal and against Company policy for any employee to harass another employee, customer, vendor or applicant for a position due to such individual's race, gender, gender identity or expression, age, national origin, color, creed, religion, physical or mental disability that can be reasonably accommodated without undue hardship, genetic information, veteran’s or military status, or any other basis protected by applicable federal, state, or local law. Such conduct will result in disciplinary action, up to and including dismissal.

IBB believes treating each other respectfully is essential to maintain a productive and conducive work environment. This policy covers all aspects of the Company's business, including recruitment, hiring, assignment, conditions of employment, compensation, training, promotion, transfer and termination.

Sexual Harassment Defined

The Company is committed to providing a workplace free from sexual harassment. It is illegal and against Company policy for any employee, male or female, to sexually harass any other employee. Such conduct will result in disciplinary action, up to and including dismissal.

Sexual harassment does not refer to an occasional compliment; it is defined, instead, as any unwelcome sexual advances, requests for sexual favors, and/or other verbal, graphic, or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of any individual's employment,
- Submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual, or
- 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.

Note that conduct that has the effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment may be "sexual harassment," whether or not the person engaging in the conduct intends to create that effect.

By way of example, sexual harassment may include, but is not limited to:

- Threatening or insinuating that an employee's submission to or rejection of sexual advances will in any way influence any personnel decision regarding that employee's
employment, evaluation, wages, advancement or assigned duties.

- Flirtation, joking, teasing or touching.
- Advances or propositions.
- Continual or repeated verbal abuse of a sexual nature.
- Graphic words used to describe an individual.
- Lewd, risqué or obscene language, actions or gestures.
- Ribald or gender-targeted jokes or cartoons.
- The display in the work place of sexually suggestive objects or pictures.
- Intentional, wrongful touching.

**Individuals Covered By the Policy Against Harassment**

The Company will not tolerate, condone, or allow harassment, whether engaged in by fellow employees, supervisors, line managers, customers, clients, vendors, consultants, visitors, independent contractors, or other non-employees who conduct business with the Company, whether it occurs in the office or outside of the workplace. IBB encourages the reporting of all incidents of discrimination and harassment, regardless of who the offender may be.

**Reporting a Complaint**

While the Company encourages individuals who believe they are being harassed to firmly and promptly notify the offender that his/her behavior is unwelcome and discriminatory, IBB also recognizes that such a confrontation is not always appropriate or advisable. The following steps should be followed in reporting harassment:

1. **Notification of Appropriate Staff**

   - Individuals who believe they were subject to harassment should report the incident to their supervisor, line manager or Human Resources.
   - If a supervisor receives a complaint in a formal or informal manner or observes conduct that s/he believes may constitute harassment, the supervisor should immediately inform Human Resources.
   - In the event that a supervisor or line manager is the alleged harasser or if the employee does not feel comfortable going to the supervisor or line manager, the complaining employee may report the incident directly to Human Resources.

2. **Description of Misconduct**

   - Oral reports of harassment should be reduced to writing by either the complainant or line manager, and signed by the complainant.

3. **Time Frame for Reporting a Complaint**
• The Company encourages prompt reporting of complaints so that a prompt response and appropriate action may be taken. The late reporting of a complaint may adversely impact the Company’s ability to respond and to take appropriate action.

4. Protection Against Retaliation

• No IBB employee may retaliate against an individual who makes a report of harassment, nor will IBB permit any employee to do so. Retaliation is a serious violation of this policy and should be reported immediately. Any person found to have retaliated against another individual for reporting discrimination or harassment may be subject to the same range of disciplinary action provided for discrimination and harassment offenders (see “Resolving the Complaint” below).

5. False Accusations

• If an investigation results in a finding that the complainant falsely accused another of harassment, knowingly or in a malicious manner, the complainant will be subject to appropriate disciplinary action, including potential termination.

Investigating the Complaint

Any allegation of harassment brought to the attention of Human Resources will be promptly investigated in as confidential a manner as possible so as to protect the privacy of persons involved. Confidentiality will be maintained throughout the investigation process to the extent practical and appropriate under the circumstances. In pursuing the investigation, the investigator will try to honor the complainant’s wishes, but the need to investigate completely all allegations will be the paramount concern.

Resolving the Complaint

Employees found to have engaged in misconduct constituting harassment will be disciplined, up to and including termination of employment.

Although IBB’s ability to discipline a non-employee harasser (i.e. customer, supplier) is limited by the degree of control, if any, that IBB has over the alleged harasser, employees should be assured that appropriate action will be taken.

Conclusion

IBB developed this policy to ensure that all of its employees work in a harassment-free environment. IBB will make every effort to ensure that all its personnel are familiar with the policy and know that any complaint received will be promptly and appropriately investigated.