



## **DISCRIMINATION AND HARASSMENT POLICY**

IEM (the “Company”) is committed to providing a work environment that is free of unlawful discrimination and harassment. The Company values diversity, inclusion, and equal opportunity as fundamental to its culture and operations. The following provides an overview of the Company’s policies and commitments in this area.

### **Equal Employment Opportunities**

The Company is an equal opportunity employer and makes employment decisions on the basis of merit. The Company prohibits unlawful discrimination against employees or applicants based on race, religion, color, national origin, disability, genetic information, marital status, sex, gender, gender identity, age, military status, veteran status, uniformed service member status, sexual orientation, citizenship status, pregnancy, or any other consideration made unlawful by federal, state, or local laws. The Company also prohibits unlawful discrimination based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics.

The Company is committed to compliance with all applicable laws providing equal employment opportunities. This commitment applies to all persons involved in the Company’s operations and prohibits unlawful discrimination by any employee of the Company, including supervisors and coworkers. Equal employment opportunity will be extended to all persons in all aspects of the employment relationship, including recruitment, hiring, training, promotion, transfer, compensation, benefits, discipline, layoff, recall, and termination.

### **Policy Against Discrimination, Harassment, and Retaliation**

The Company is committed to providing a work environment that is free of unlawful discrimination and harassment and requires all employees to treat each other with dignity and respect. In keeping with this commitment, the Company maintains a strict policy prohibiting unlawful harassment and discrimination in the workplace, including sexual harassment, by any employee or supervisor and by any third parties such as contractors, guests, or vendors. In addition, any discrimination or harassment of an employee on the basis of race, religion, color, national origin, disability, genetic information, marital status, sex, gender, gender identity, age, military status, veteran status, uniformed service member status, sexual orientation, citizenship status, pregnancy, or any other consideration made unlawful by federal, state, or local laws is also strictly prohibited.

Harassment can come in many forms, including verbal harassment (e.g., epithets,



derogatory comments, or slurs), physical harassment (e.g., assault, touching, impeding or blocking movement, or any physical interference with normal work or movement), or visual harassment (e.g., images or gestures) directed towards an individual on the basis of a protected characteristic.

### **Sexual Harassment**

Unwelcome sexual advances, requests for sexual favors, widespread sexual favoritism, and other verbal, physical or visual conduct of a sexual nature constitute unlawful sexual harassment if (i) submission to such conduct is made an explicit or implicit term or condition of employment; (ii) submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual; or (iii) such conduct has the purpose or effect of either (a) unreasonably interfering with an individual's work performance or (b) creating an intimidating, hostile, or offensive working environment. Sexual harassment includes gender harassment and harassment on the basis of pregnancy, childbirth, or related medical conditions, and also includes sexual harassment of an employee of the same gender as the harasser. Examples of conduct which may violate this policy include, but are not limited to: offensive or unwelcome sexual flirtations, advances or propositions; threats and demands to submit to sexual requests; offering employment benefits in exchange for sexual favors; making or threatening reprisals after a negative response to sexual advances; widespread sexual favoritism; verbal abuse of a sexual nature; graphic verbal commentaries about an individual's body; sexually degrading words used to describe an individual; sexually-oriented jokes, e-mails, or written materials; visual conduct, including leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons or posters; and the unwelcome physical touching of others.

### **Complaint Procedure**

The Company takes all reports of discrimination and harassment seriously. Any individual who believes they have been subjected to or witnessed conduct in violation of this policy is encouraged to report such concerns promptly. The Company will investigate all reports or complaints of harassment or discrimination thoroughly, promptly, fairly, and discreetly. The investigator will be impartial and qualified and will document progress throughout the investigation. The investigator will afford all parties appropriate due process and will reach a reasonable conclusion based on the evidence collected. To the extent possible, the confidentiality of all parties involved will be protected against unnecessary disclosure.

The Company will take action to deter any future discrimination and/or harassment. The Company considers any discrimination and/or harassment to be a serious offense which can result in disciplinary action for the offender, up to and including



termination. If an investigation has concluded that harassment or discrimination occurred, the Company will take appropriate remedial corrective action, up to and including termination.

**Policy Against Retaliation**

The Company strictly prohibits retaliation, coercion or intimidation against any person who has, in good faith, opposed harassment or discrimination, filed a complaint of harassment or discrimination, or participated in any proceeding involving a complaint of harassment or discrimination. Any employee who is found to have committed such retaliation will be subject to discipline, up to and including termination.