



Anti-Discrimination and Anti-Harassment Policy

Turbine Controls is committed to providing its employees with a professional work environment, free from harassment and discrimination. This commitment is in keeping with the Company's equal employment opportunity policy and with applicable laws.

SEXUAL HARASSMENT IS ILLEGAL and is prohibited by state law and Title VII of the Civil Rights Act of 1964 (42 U.S.C Sec. 2000e *et seq.*)

The Company will not tolerate verbal or physical conduct by anyone, including employees, vendors or customers, that discriminates against anyone associated with the Company, on the basis of any legally protected status, or which harasses, disrupts or interferes with an employee's work performance or which creates an intimidating, offensive or hostile working environment.

Any behavior that creates or is reasonably perceived by an individual to create a hostile, offensive, unwelcomed or intimidating work environment constitutes harassment.

Harassment includes, but is not limited to, the following:

- Derogatory or offensive jokes
- Slurs (racial, ethnic, religious, gender, age, etc.)
- Unwelcome and unwanted physical contact of any kind
- Display or circulation of written materials or pictures (hard copy, via electronic mail, etc.) that are derogatory to males, females, persons with disabilities, or to racial, ethnic, religious, and other protected groups
- Defamation of character including unfounded charges and complaints brought against a fellow employee with intent to discredit, harass or in any way harm that employee
- Unwelcome and unsolicited sexual advances
- Physical or verbal abuse
- Requests for sexual favors (Quid Pro Quo) used as a condition of employment or affecting any personnel decisions, such as hiring, promotion, transfer, performance appraisal, compensation
- Employment opportunities or benefits granted to one individual over another individual as a result of submission to or rejection of sexual advances.

While all forms of discrimination and harassment based on an employee's legally protected status are prohibited, including but not limited to, any adverse job action or harassment based on race, color, religion, gender, national origin, age, disability, marital status, veteran status, genetic information, gender identity/expression or sexual orientation, it is the



Company's policy to emphasize that sexual harassment is illegal and prohibited by both state and federal law.

Under State law, sexual harassment is defined as an unwelcome sexual advance, request for sexual favors, or other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is either an explicit or implicit term or condition of employment;
- Submission to or rejection of the conduct is used as a basis for an employment decision affecting the person rejecting or submitting to the conduct; or
- The conduct has the purpose or effect of substantially interfering with an individual's work performance, or creating an intimidating, hostile, or offensive work environment.

Any employee who believes that the actions or words of a supervisor or fellow employee or any outside party in the workplace constitute unwelcome harassment or unlawful discrimination has a responsibility to report such conduct or immediately complain to a Department Manager or Human Resources. The Company **requires** all managers, officers and directors to report any observed or reported incidents and/or complaints of unlawful harassment or discrimination to Human Resources immediately.

Complaints and incidents of unlawful harassment or discrimination will be investigated and resolved in a thorough and timely manner. Confidentiality at the time of reporting the incident will be preserved to the maximum extent possible. Information about the allegation of harassment or discrimination and the investigation will be shared with only those who need to know and the Company expects everyone involved to treat this information in a similar manner.

Any employee determined to have committed unlawful harassment or discrimination will be subject to appropriate disciplinary action, up to and including termination. Moreover, any individual who makes unwelcome advances, threatens or in any way discriminates or harasses another employee based on a legally protected status may be personally liable for monetary damages for such actions and their consequences.

Retaliation against an individual who has complained about unlawful harassment or discrimination, and retaliation against individuals for cooperating with an investigation of such a complaint is unlawful and will not be tolerated by the Company. However, any employee who is determined to have made up false accusations of unlawful harassment or discrimination will also be subject to appropriate disciplinary action, up to and including termination.