HARASSMENT IS ILLEGAL. YOU CAN HELP STOP IT!

Securitas Critical Infrastructure Services, Inc.

Sexual Harassment Prevention Guidelines

WHAT IS SEXUAL HARASSMENT?

Employees and the Company can be held legally liable for sexual harassment. Sexual harassment is defined as unwelcome verbal or physical conduct, or advances of a sexual nature, or any harassment based on gender, gender identity, sex, sexual orientation, pregnancy or other protected class. There are three main types of OFFENSIVE behavior:

1. Conduct of a sexual nature that creates an offensive and/or hostile work environment;
2. Coercive sexual conduct by a person in a position of power in the workplace;
3. Discrimination based on a person's gender.

Examples of Prohibited Conduct

Verbal Conduct

- Jokes, slurs and/or comments of a sexual nature;
- Requests for sexual favors;
- Insulting remarks directed toward a person relating to gender;
- Unwelcome sexual advances, invitations or propositions;
- Sexual comments about a person's body or appearance;
- Offers of employment benefits in exchange for sexual favors;
- Threats or actual retaliation after a negative response to sexual advances;
- Talking about sex or your sex life, or asking other employees intimate questions;
- Vulgar, offensive or bad behavior;
- Repeated requests for a date even when rejected.

Even if you overhear remarks meant for someone else, this might be considered sexual harassment if it is offensive to you.

Physical Conduct

- Offensive or sexually offensive touching;
- Repeatedly violating an employee's personal space;
- Blocking or making motion difficult;
- Brushing up against a body;
- Touching, hugging or kissing;
- Patting, grabbing or pinching;
- Any unwanted or unwelcome physical conduct of a sexual nature.

Non-Verbal Conduct

- Staring or leering at someone's body;
- Obscene motions, gestures or sounds;
- Sexually suggestive screen savers;
- Posters, pictures, objects, cartoons, drawings, letters, notes, stories, statues, that are sexually suggestive or pornographic, or that are displayed, posted, or viewed on the internet or sent by e-mail or text message.

Invitations

- It's not sexual harassment when another employee asks for a date and accepts "no" for an answer. It might be sexual harassment if someone repeatedly asks for a date, and won't take "no" for an answer.

WHO MUST REPORT HARASSMENT?

All Employees:
If the person harassed does not report the harassment, encourage him or her to come forward. The person harassed should report harassment, as well as anyone who observes harassment.

All Managers and Supervisors:
If you see or are told about instances of sexual harassment, you are required to follow the chain of command and immediately forward the report to the Company through your Human Resources, Management, or Corporate Human Resources. **You do not have a choice.**

It is your responsibility to the Company to help prevent harassment in the workplace. These are the things that you can do:

- Do not permit employees to tease each other.
- Prohibit name-calling, slang and slurs.
- Treat male and female employees equally.
- Stop rumors, gossip and stereotypical remarks.
- Do not permit others to speak, joke or act in a sexually explicit manner or nature.

WHAT YOU SHOULD KNOW ABOUT SEXUAL HARASSMENT

- **SEXUAL HARASSMENT IS ILLEGAL**.
- Complaints of sexual harassment are taken seriously by the Company.
- Complaints are investigated in a prompt and thorough manner.
- If sexual harassment is found, the harasser may be subject to counseling and/or discipline up to and including dismissal.
- The harasser could face personal liability.
- The Company prohibits any kind of retaliation against persons who report harassment.

The Company always attempts to resolve sexual harassment complaints internally. If an employee believes the complaint has not been appropriately resolved through internal channels, the employee has the right to file a complaint with a state or federal civil rights agency. These agencies are listed in your local telephone directory, or on the poster located in your employee information area at work.

PREVENTATIVE AND REMEDIAL MEASURES

The Company takes an aggressive, proactive approach to prevent and correct sexual harassment in the workplace. The following are measures taken by the Company:

- Implementing and distributing, clear policies, and/or procedures prohibiting sexual harassment;
- Educating employees about harassment;
- Training employees, supervisors and managers;
- Providing multiple ways to report harassment;
- Confidential/anonymous employee hotline: The Securitas Critical Infrastructure Services Hotline;
- Conducting prompt and appropriate investigations;
- Resolving allegations internally through complaint resolution procedures;
- Issuing appropriate discipline and taking remedial action, as necessary.

OTHER FORMS OF UNLAWFUL HARASSMENT ARE ALSO PROHIBITED

The Company has a policy against all forms of unlawful discrimination or harassment. All reasonable steps necessary are taken to prevent discrimination and harassment from occurring in the workplace. The principles outlined in this brochure also apply to harassing behavior based upon race, creed, color, religion, physical/mental disability, medical condition, genetic information, national origin, ancestry, citizenship status, age, marital status, veteran status, status with regard to public assistance, or any other protected class under federal or state law. If you are aware of any discrimination or harassing comments or conduct regarding any of these categories, please bring such information to the attention of SCIS management.

Note: SCIS prohibits retaliation against any person who reports a complaint in good faith, or for filing, testifying, assisting or participating in any investigation conducted by the Company or a government enforcement agency.

WHAT TO DO IF YOU THINK YOU HAVE BEEN HARASSED

Tell the harasser to STOP and that the conduct makes you uncomfortable. If the unwanted behavior does not stop immediately, report the conduct to:

- Supervisor, or
- Human Resources, or
- Management, or
- Vice President of Human Resources, or
- Employee Relations, or
- The Securitas Critical Infrastructure Hotline at 1-800-574-8637, or
- File online at www.scishotline.com

Note: Reporting concerns to client may delay the investigation and resolution

REPORTING IS ESSENTIAL

The Company cannot resolve problems unless we know about them. Any employee filing a report of sexual harassment is expected to assist in our investigation and provide accurate and truthful information.

Failing to report harassment will only cause a delay in Securitas Critical Infrastructure Services' (SCIS) ability to stop the offensive conduct.

FOR EMPLOYEES IN THE FOLLOWING STATES:

California: Call **Department of Fair Employment and Housing (DFEH)** at **1-800-884-1684**.

Massachusetts: Call **Massachusetts Commission Against Discrimination (MCAD)** at **1-617-994-6000**.

Vermont: Call **Vermont Human Rights Commission** at **1-800-416-2010** or **1-802-828-2480**, or the **Office of the Attorney General** at **1-802-828-3171.**

Rhode Island: Call **Rhode Island Commission for Human Rights** at **1-401-222-2661**.

All Other States: Call the **Equal Employment Opportunity Commission (EEOC)** at **1-800-669-4000** or go to: **www.eeoc.gov**.

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