

Subject: Subject: Equal Employment Opportunity and Policy Against Discrimination, Harassment (including Sexual Harassment), and Retaliation	Effective Date: December 2006
Responsibility: Human Resources	Revision Date: September 2011

Policy:

KRA Corporation (KRA) is committed to the principle of equal employment opportunity, and complies with all applicable laws that prohibit discrimination and harassment in the workplace. Consequently, KRA strictly prohibits discrimination or harassment based on race, color, age, sex, creed, national origin, disability, marital status, sexual orientation, citizen status, or any other characteristic protected by law in all terms, conditions, and privileges of employment, including without limitation, recruiting, hiring, assignment, compensation, promotion, discipline, and termination. This policy applies to all KRA employees, and covers conduct occurring at KRA offices, worksites, and any location where KRA is providing services and/or work-related activities.

KRA will not tolerate discrimination or harassment, whether engaged in by fellow employees, supervisors, or managers. Nor will KRA tolerate discrimination or harassment engaged in by non-employees who conduct business with KRA to the extent that it affects any employee of KRA. While at work, employees must not engage in any form of discrimination or harassment with respect to anyone, including other employees, clients, visitors, guests, or anyone with whom an employee comes into contact. All KRA managers and supervisors are responsible for preventing and eliminating discrimination and harassment in the workplace.

Forms of Harassment: While all forms of discrimination and harassment are prohibited, it is important to understand the types of conduct that may be viewed as harassment and therefore are prohibited.

- *Non-Sexual Harassment* includes making, displaying, or circulating (including through use of KRA's computer, telephone, voice mail, e-mail, fax, or other communications or information systems) epithets or derogatory statements, remarks, comments, jokes or slurs, posters, cartoons, drawings, or other written materials that are based on a person's race, color, religion, national origin, sex, age, disability, or other protected characteristic.
- *Sexual Harassment* includes, but is not necessarily limited to, unwelcomed or unwanted sexual advances, requests for sexual acts or favors, lewd or sexually suggestive remarks, comments or jokes, display or circulation of pictures or written materials of a sexual nature (including through use of KRA's computer, telephone, voice mail, e-mail, fax, or other communications or information systems), inappropriate physical contact or other verbal, written, or physical conduct of a sexual nature when (i) submission to or rejection of this conduct by an individual is used explicitly or implicitly as a factor in decisions affecting hiring, evaluation, promotion, retention, or other aspects of employment; or (ii) this conduct substantially interferes with an individual's employment or creates an intimidating, hostile, or offensive work environment.

Protection Against Retaliation: KRA prohibits and will not tolerate retaliation against any individual who makes a complaint under this policy, or anyone who has assisted a person making a complaint or provided information during an investigation under this policy. Retaliation is a violation of this policy

KRA reserves the right to continually evaluate, amend, modify, or terminate any policy at any time. This policy is in effect on the date of publication and supersedes any previously released policy. Individual sites/contracts may have more restrictive policies. This policy does not alter the at-will status of any employee. Use or disclosure of this information is restricted; contact Human Resources for additional information.

and should be reported immediately. The same complaint and investigation procedures described below will also apply to any complaint of retaliation.

Procedure:

KRA encourages employees who believe they are being subjected to discrimination or harassment to notify the offender that his/her behavior is unwelcome. If for any reason an employee does not want to confront the offender directly, or if this approach does not successfully end the discrimination or harassment, the employee should promptly contact either his/her supervisor, Human Resource (HR) Partner, or the HR Director. Employees should not feel obligated to file their complaints with their immediate supervisor first, before bringing the matter to the attention of one of the other designated KRA representatives. KRA cannot act if it is not made aware of a situation.

All reports of discrimination, harassment, or retaliation will be promptly investigated. The investigation may include interviews with any person having relevant information, including the complainant, the accused, and any witnesses. To the extent possible, KRA will protect the confidentiality of a complainant. Information concerning the complaint will be limited to those with a need-to-know in order to investigate and respond to the complaint.

Any supervisor or manager receiving a report or complaint of discrimination, harassment, or retaliation must report it immediately to the HR Director.

Upon completion of an investigation, appropriate action will be taken. Any employee found to have engaged in discrimination, harassment, or retaliation will be subject to disciplinary action, up to and including termination.

Employees who have questions about this policy should contact their HR partner or the HR Director.

Form:

Acknowledgement of Harassment Training