

Anti-Harassment & Nondiscrimination Policy

Southeastern firmly believes that all employees and applicants should work in an environment free from unwelcome harassment by co-workers, independent contractors, supervisory personnel and/or vendors and their employees.

Prohibited Harassment

The following conduct constitutes prohibited "unwelcome harassment" within the meaning or coverage of this policy.

1. Sexual Harassment: Prohibited sexual harassment includes any unwelcome sexual advances, requests for sexual favors, or other unwelcome written, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is an explicit or implicit condition of employment;
- Submission to or rejection of such conduct is used as the basis for employment decisions;
- 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; or
- Such conduct otherwise adversely affects an individual's employment opportunities.

2. Other Prohibited Harassment: Other forms of prohibited harassment include any unwelcome written, verbal or physical conduct that belittles, shows hostility, or ridicules an individual because of race, color, religion, national origin, age, or disability, when such conduct:

- has the purpose or effect of creating an intimidating, hostile or offensive working environment;
- has the purpose or effect of unreasonably interfering with an individual's work performance; or
- otherwise adversely affects an individual's employment opportunities.

Reporting Unwelcome Harassment

In the event that you are the victim of any of the behaviors described above, or witness anyone engaging in any such behaviors, you must report the incident immediately. To report violations of this policy, contact Steve Fracchia at 818-5189 or, in his absence or if unavailable, Andy McCarroll at 818-5185.

Investigation of Unwelcome Harassment

Reports of unwelcome harassment will be treated seriously and an investigation will be initiated promptly. To the extent possible, confidentiality will be maintained.

Disciplinary Measures

When an investigation reveals that allegations of unwelcome harassment are true, Southeastern will take appropriate prompt remedial action, up to and including termination. All disciplinary measures will be implemented promptly and shall be proportionate with the person's conduct. The remedies vary depending on the entire facts and circumstances found by the investigation.

Continued Harassment, Nondiscrimination and Retaliation

If, following prompt remedial action, the unwelcome harassment continues, the victim should report the recurrence of the conduct in accordance with the procedures in this policy, and Southeastern will take additional remedial measures necessary to end the conduct. Southeastern does not discriminate or retaliate against any person, nor tolerate such activity from fellow employees, who reports a violation of this policy or participates in an investigation of a complaint regarding unwelcome harassment.