



Non-Associate Anti-Harassment Standards for Assignment at JM Family

Overview

JM Family Enterprises, Inc., JM Family Holdings Group LLC, and JM Family Automotive LLC (including its subsidiaries other than JM NTP Holdings LLC (and its subsidiaries)), (collectively, “the Company”). is firmly committed to maintaining a work atmosphere free of workplace harassment based on age, race, religion, color, gender, sex (including pregnancy, childbirth and related medical conditions), sexual orientation, gender identity, gender expression, mental or physical disability, national origin, marital status, citizenship, military status, genetic information, veteran status, or any other characteristic protected by federal, state, provincial, or local law

Scope

All Associates, management, non-associates, other workers on site, applicants, vendors, and customers are expected to adhere to these guidelines at all times and in all dealings.

Details

The Equal Employment Opportunity Commission has issued guidelines defining workplace harassment as verbal or physical conduct that degrades or shows hostility or aversion toward an individual because of individual’s age, race, religion, color, gender, sex (including pregnancy, childbirth and related medical conditions), sexual orientation, gender identity, gender expression, mental or physical disability, national origin, marital status, citizenship, military status, genetic information, veteran status, or any other actual or perceived characteristic; and unwelcome behavior of a sexual nature. Such conduct violates these guidelines, even if it does not rise to the level of a violation of applicable federal, state, or local laws and ordinances. Because it is difficult to define unlawful harassment, non-associates are expected to behave at all times in a manner consistent with the intended purpose of these guidelines. Harassing behaviors are unacceptable in the workplace and in any work-related settings such as business trips and Company-sponsored social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party. In addition, to being a violation of these guidelines, harassment based on any protected characteristic as defined by applicable federal, state, or local laws and ordinances is unlawful.

Prohibited forms of verbal and physical harassment include but are not limited to:

- Name-calling, slurs, negative stereotypes, jokes or insults;
- Acts of unwelcome touching or threats of unwelcome touching;
- Written or graphic material, including electronic communications that degrades or shows hostility;
- Aversion toward an individual or group that is placed on walls or elsewhere on the company premises, circulated in the workplace, sent electronically, or displayed on clothing; and
- Persistently engaging in words, gestures, and actions which tend to annoy, alarm, offend,



embarrass, intimidate, demean, or verbally abuse another person.

Sexual harassment may include a range of subtle and overt behaviors and may involve individuals of the same or different gender. It also can include all of the above actions, as well as other unwelcome conduct, such as unwanted sexual advances, requests for sexual favors or other visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to, or rejection of, such conduct or requests is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an associate's work performance or creating an intimidating, hostile, or offensive working environment.

Depending upon the circumstances, these behaviors may include, but are not limited to:

- Unwanted sexual advances or demands, threats or requests for sexual favors;
- Sexual jokes, lewd stories and innuendo;
- Verbal abuse of a sexual nature;
- Commentary about an individual's body, sexual prowess or sexual deficiencies;
- Leering, whistling or unwelcome physical contact;
- Insulting or obscene comments or gestures;
- Possession or display of sexually suggestive objects or pictures (including clothing, files, websites, etc.) in the workplace and/or other physical, verbal or visual conduct of a sexual nature;
- Use of entertainment which may be construed as sexually explicit or harassing in nature;
- Sending or forwarding any electronic communication (i.e., email, instant messaging, social media, etc.) that could be construed as sexually explicit or harassing such as cartoons, calendars, displays/images, pictures, jokes, etc.

Violation of these guidelines will result in an end of assignment.

Reporting incidents immediately protects you and others from further unwelcome conduct and promotes the healthy and respectful environment that the Company intends to create. Please review the Non- Associate Complaint Procedure for instructions on how to report a violation of these guidelines.