



Schuler-Haas Electric Corp.

240 COMMERCE DR. • ROCHESTER, NY 14623 • (585) 325-1060 • FAX (585) 325-3101 •
www.schuler-haas.com

SEXUAL HARASSMENT POLICY

Schuler-Haas is committed to maintaining a workplace free from all forms of discrimination, including sexual harassment. All employees and non-employees conducting business in our workplace must work in a manner that prevents sexual harassment in the workplace. Sexual harassment is against the law and all employees have a right to work in a workplace free from sexual harassment. Sexual harassment will not be tolerated. Any employee or individual covered by this policy who engages in sexual harassment or retaliation will be subject to remedial and/or disciplinary action (e.g., counseling, suspension, termination).

DEFINITION OF SEXUAL HARASSMENT

Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex when:

- 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, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which is of a sexual nature, or which is directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called "quid pro quo" harassment.

EXAMPLES OF SEXUAL HARASSMENT

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical acts of a sexual nature, such as:
 - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body or poking another employee's body;
 - Rape, sexual battery, molestation or attempts to commit these assaults.

- Unwanted sexual advances or propositions, such as:
 - Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments;
 - Subtle or obvious pressure for unwelcome sexual activities.
- Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a sex should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
 - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- A hostile action taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender.

REPORTING SEXUAL HARRASSMENT

Preventing sexual harassment is everyone's responsibility. Schuler-Haas cannot prevent or remedy sexual harassment unless it knows about it. Any employee paid or unpaid intern or non-employee who has been subjected to behavior that may constitute sexual harassment is encouraged to report such behavior to a supervisor, manager or to Dan Streicher or Ed Schuler. Anyone who witnesses or becomes aware of potential instances of sexual harassment should report such behavior to a supervisor, manager or Dan Streicher or Ed Schuler.

Reports of sexual harassment may be made verbally or in writing. A form for submission of a written complaint is available in the project safety manual or from Dan Streicher or Ed Schuler. Employees who are reporting sexual harassment on behalf of other employees should use the complaint form and note that it is on another employee's behalf.

MANAGEMENT RESPONSIBILITIES

Any member of management who observes an employee violating this policy should take immediate action to stop the misconduct. Any member of management who receives a complaint of sexual harassment or obtains knowledge of sexual harassment by other means is required to immediately notify Dan Streicher or Ed Schuler, even if no complaint has been made by an employee, or even if the employee complaining has requested that no action be taken.

All members of management are also responsible for ensuring that the company is free from sexual harassment even if it is committed by individuals outside the company. This may include, but is not limited to: customers, vendors, independent contractors, visitors, or any other individual conducting business in the workplace.

In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected sexual harassment or otherwise knowingly allowing sexual harassment to continue.

INVESTIGATION OF SEXUAL HARRASSMENT

All complaints or information regarding sexual harassment will be investigated. An investigation of any complaint, information or knowledge of suspected sexual harassment will be prompt and thorough, commenced immediately and completed as soon as possible. The investigation will be kept confidential to the extent possible. All persons involved, including complainants, witnesses and alleged harassers will be accorded due process to protect their rights to a fair and impartial investigation. Effective corrective action will be taken whenever sexual harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment.

The investigation process involves:

- Speaking with the employee
- Speaking with the alleged harasser
- Interviewing witnesses
- Collecting and reviewing any related documents

Schuler-Haas will document the findings of the investigation and the basis for its decision along with any corrective actions taken and notify the employee and the individual(s) against whom the complaint was made. This may be done via email.

PROHIBITION ON RETALIATION

No person covered by this Policy shall be subject to adverse action because the employee reports an incident of sexual harassment, provides information, or otherwise assists in any investigation of a sexual harassment complaint. Schuler-Haas will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected sexual harassment. Any employee of Schuler-Haas who retaliates against anyone involved in a sexual harassment investigation will be subjected to disciplinary action, up to and including termination. All employees' paid or unpaid interns or non-employees working in the workplace who believe they have been subject to such retaliation should inform a supervisor, manager, or Dan Streicher or Ed Schuler. All employees, paid or unpaid interns or non-employees who believe they have been a target of such retaliation may also seek relief in other available forums, as explained below in the section on Legal Protections.

LEGAL PROTECTIONS AND EXTERNAL REMEDIES

Aside from the internal processes at Schuler-Haas, employees may also choose to pursue legal remedies pursuant to the protections and procedures under applicable local, state and federal law, including without limitation:

- The New York State Human Rights Law, codified as N.Y. Executive Law, art. 15, § 290 et seq. A complaint alleging violation of the Human Rights Law may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court. DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: www.dhr.ny.gov. Contact DHR at (888) 392-3644 or visit dhr.ny.gov/complaint for more information about filing a complaint. The website also contains contact information for DHR's regional offices across New York State.
- The Civil Rights Act of 1964. The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An employee alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at www.eeoc.gov or via email at info@eeoc.gov.
- Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists.
- If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

Sexual Harassment Program Acknowledgement

I hereby acknowledge that I have read a copy of the Schuler-Haas Electric Inc. Sexual Harassment program. I agree to comply with the policies and procedures contained in the program for the protection of my co-workers and myself. By signing this I assure of my awareness of my responsibilities and rights under this program.

In addition, I acknowledge that at any time if I have any questions regarding this policy, that I am free to question management until I am sure of my own well-being.

Employee Signature	Employee Name (Print)	Date