



Harassment Free Workplace Policy

Purpose/Objective

The purpose of this policy is to provide a workplace in which all individuals are treated with respect and dignity, free from harassment and discrimination.

Scope

This policy applies to all employees and covered parties as defined in the Introductory Statement to All Policies.

Policy

It is the policy of the Company that all individuals have the right to work in an environment free from any unwelcome or unlawful forms of harassment and any form of discrimination where they are treated with respect and dignity.

The Company has developed this policy to ensure that all its employees and covered parties doing business with or inside a company workplace can be in an environment free from unlawful, unwelcome harassment, discrimination, and retaliation of any form. The Company will make every reasonable effort to ensure that all concerned are familiar with this policy and aware that any complaint in violation of this policy will be investigated and resolved appropriately.

This policy prohibits harassment or discrimination in any form by an employee or covered party doing business with or inside a Company workplace. Violation of this policy will not be tolerated and will result in disciplinary action up to and including termination.

Harassment

Harassment is any form of discrimination that violates Title VII of the Civil Rights Act of 1964, the Age Discrimination Act of 1967 (ADEA), the Americans with Disabilities Act of 1990 (ADA), the Americans with Disabilities Amendments Act (ADAAA), and all applicable federal and state laws.

The U.S. Equal Employment Opportunity Commission (EEOC) defines harassment as unwelcome conduct that is based on race, color, religion, sex, pregnancy, national origin, age, disability or genetic information. Harassment is considered unlawful where enduring the unwelcome conduct becomes a condition of employment, or the conduct is such that a reasonable person would consider the work environment intimidating, hostile, or abusive.

Harassment includes but is not limited to verbal language that reinforces social structures of domination related to gender identity and expression, sexual orientation, disabilities, neurodiversity, physical appearance, body size, ethnicity, nationality, race, age, religion, or other protected category; sexual imagery in public spaces; deliberate intimidation; stalking; following; harassing photography or recording; sustained disruption of talks or other events; offensive verbal language; inappropriate physical

contact; and unwelcome sexual attention. Participants asked to stop any harassing behavior are expected to comply immediately.

Sexual Harassment

It is unlawful to harass a person (an applicant, employee or covered party) because of that person's sex. Harassment can include "sexual harassment" or unwelcome sexual advances or propositions, requests for sexual favors, and other verbal or physical harassment of a sexual nature, employments in exchange for sexual favors, sexual gestures, sexually explicit jokes, physical conduct such as touching, assaulting, impeding or blocking movement.

Harassment does not have to be of a sexual nature, however, and can include offensive remarks about a person's sex. For example, it is illegal to harass a woman by making offensive comments about women in general. Although the law does not prohibit simple teasing, offhand comments or isolated incidents that are not serious, harassment is illegal when it is so frequent or severe that it creates a hostile or offensive work environment or when it results in an adverse employment decision (such as the victim being fired or demoted).

Sexual harassment is recognized under Title VII of the Civil Rights Act of 1964 as quid pro quo and hostile work environment.

Quid Pro Quo - Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute quid pro quo sexual harassment when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment and/or (2) submission or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual.

Hostile Environment – An environment in which unwelcome sexual advances, requests for sexual favors and verbal or other conduct of a physical nature occur and 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.

Reporting

The Company encourages reporting of all perceived incidents of harassment and/or discrimination. It is the Company's policy to promptly and thoroughly investigate each report.

Individuals who believe they have been victims or believe they have witnessed such conduct should discuss their concerns with their manager or supervisor or The Human Resources Department. Conduct can also be reported through the ethics hotline by calling 833-330-0020 or visiting online at www.lighthouse-services.com/andersonsinc. Prompt reporting of complaints or concerns is encouraged. As required by law any reported incidents or concerns will be promptly investigated by the Company. While not promising complete confidentiality, the Company will strive to protect the identities of victims and witnesses to the extent reasonably necessary.

Retaliation

No hardship, no loss of benefits, and no penalty may be imposed on an employee or covered party as punishment for filing a good faith complaint of harassment or responding to a complaint of harassment, appearing as a witness in the investigation of a complaint, service as an investigator or otherwise cooperating in a workplace investigation. Retaliation or attempted retaliation is a violation federal law and of this Policy. Any employee or covered party who engages in retaliatory behavior will be subject to discipline, up to and including termination.

Equal Employment Opportunity

The Company will ensure equal employment opportunities without harassment and discrimination based on race, color, religion, sex, sexual orientation, transgender, transitioning, sexual identification, marital status, military status, national origin, citizenship, gender, age, disability, genetic information or any other basis prohibited by local, state or federal laws. Please refer to the Company Equal Employment Opportunity Policy.

Exceptions

The Company recognizes that each state has its own employment laws that may differ from Federal provisions. State specific laws are addressed in the Employee Handbook.

There are no exceptions to this policy unless otherwise required by applicable federal or state law. In the event of any conflict between this policy and the applicable law, employees will be afforded all rights required by law.