Policy Against Harassment

JSCo is committed to providing a work environment free of harassment. JSCo policy prohibits sexual harassment and harassment based on race, color, religion, creed, sex (including gender, gender identity, gender expression, pregnancy, perceived pregnancy, childbirth, and other related medical conditions), sexual orientation and identity, national origin/ancestry, age, physical or mental disability, marital/familial status (including domestic partnership), military or veteran status, citizenship status, political activities or affiliations, medical condition, genetic characteristic or information, persons with AIDS or AIDS related condition or any other consideration protected by federal, state, or local laws.

Sexual Harassment Defined

Applicable state and federal law defines sexual harassment as unwanted sexual advances, requests for sexual favors, or visual, verbal, or physical conduct of a sexual nature when: (1) submission to the conduct is made a term or condition of employment; (2) submission to or rejection of the conduct is used as basis for employment decisions affecting the individual; or (3) the conduct has the purpose or effect of unreasonably interfering with the employee's work performance or creating an intimidating, hostile, or offensive working environment. This definition includes many forms of offensive behavior. The following is a partial list:

- Unwanted sexual advances;
- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct such as leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, or posters via the mail, e-mail or in person;
- Verbal conduct such as making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about any employee's body or dress;
- Verbal sexual advances or propositions;
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, or suggestive or obscene letters, notes, or invitations;
- Physical conduct such as touching, assault, or impeding or blocking movements; and
- Retaliation for reporting harassment or threatening to report harassment.

Sexual harassment on the job is unlawful regardless of gender or whether it involves co-worker harassment, harassment by a supervisor, or harassment by persons doing business with or for the Company.

Other Types of Harassment

Harassment on the basis of race, color, religion, creed, sex (including gender, gender identity, gender expression, pregnancy, perceived pregnancy, childbirth, and other related medical conditions), sexual orientation and identity, national origin/ancestry, age, physical or mental disability, marital/familial status (including domestic partnership), military or veteran status, citizenship status, political activities or affiliations, medical condition, genetic characteristic information, persons with AIDS or AIDS related condition or any other protected consideration is strictly prohibited and includes behavior similar to sexual harassment, such as:

- Verbal conduct such as threats, epithets, derogatory comments, or slurs;
- Visual conduct such as derogatory posters, photographs, cartoons, drawings, or gestures;
- Physical conduct such as assault, unwanted touching, or blocking normal movement; and
- Retaliation for reporting harassment or threatening to report harassment.
Harassment and Discrimination Complaint Procedure

Harassment, discrimination or suspected harassment or discrimination must be reported immediately by employees to their direct supervisor, other JSCo supervisor or Human Resources. JSCo encourages employees to report harassment and discrimination in writing but will accept verbal reports. Reports should state the specific details of the incident(s), including: the names of individuals involved, the names of any witnesses, direct quotes when relevant, and any documentary evidence (notes, pictures, cartoons, etc.).

Supervisors shall refer all harassment reports to Human Resources. All incidents of harassment or discrimination that are reported will be taken extremely seriously and investigated thoroughly and promptly. JSCo will begin an investigation of any claim of harassment upon receipt of a report. Employees reporting harassment will receive written notification of the status of the investigation within 15 business days from the date the report was submitted. All employees are expected to cooperate in such an investigation and to be honest and forthcoming with pertinent information. The investigation will be as discreet and confidential as possible and consistent with applicable law.

If JSCo determines that harassment has occurred, remedial action will be taken in accordance with the circumstances involved. Any employee determined by the Company to be responsible for harassment will be subject to appropriate disciplinary action, up to and including termination. An appropriate JSCo representative will advise all parties concerned of the results of the investigation. The Company will not tolerate or permit retaliation by management, employees or co-workers against any employee for filing a good faith complaint.

Any employee who engages in harassment or any supervisor who knew about the harassment and took no reasonable action to stop it or failed to report it may be subject to disciplinary action, up to and including termination, and may be held personally liable for monetary damages. Accordingly, to the extent permitted by law, the Company reserves the right not to provide a defense or pay damages assessed against employees for conduct in violation of this policy.

Protection Against Retaliation

In addition to the Company’s Whistleblower and Anti-Retaliation provisions, applicable law also prohibits retaliation against any employee by another employee or by the Company for reporting or filing complaints of discrimination or harassment, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by the Company or a federal or state enforcement agency, or for asserting rights protected under the California Labor Code (or who is planning to or believed to have done any of the above activities). Please report any suspected retaliation to your supervisor or any other Company supervisor or the Director of Human Resources of the Company. Any report of retaliatory conduct will be objectively, timely and thoroughly investigated in accordance with the Company’s investigation procedure outlined above. If a report of retaliation is substantiated, appropriate disciplinary action, up to and including immediate discharge, will be taken.

If the Company determines that retaliation has occurred, remedial action will be taken, commensurate with the severity of the offense. Appropriate action will also be taken to deter any future retaliation. The Company will not retaliate against any employee for filing a complaint in good faith and will not tolerate or knowingly permit retaliation by management employees or coworkers.
Members of management of all levels of supervision have an obligation to stop discrimination and all forms of harassment from occurring and must report conduct that may violate this policy in the manner set forth above.

**Additional Enforcement Information**

In addition to the Company’s internal complaint procedure, employees should also be aware that the federal Equal Employment Opportunity Commission (EEOC) and the California Department of Fair Employment and Housing (DFEH) investigate and prosecute complaints of harassment or discrimination in employment. Employees who believe that they have been harassed or discriminated against may file a complaint with either of these agencies. These agencies serve as neutral fact-finders and attempt to help the parties voluntarily resolve disputes.

For more information, please contact JSCo’s Human Resources Director. You may also contact the nearest office of the EEOC or DFEH, as listed in the telephone directory.

**Anti-Bullying Policy**

The Company prohibits workplace bullying. Workplace bullying includes actions taken by one employee against another, with malice, which are hostile, offensive and unrelated to the Company’s legitimate business interests.

Workplace bullying includes, but is not limited to, the following:

- Repeated verbal abuse, such as the use of derogatory remarks, insults and epithets;
- Verbal or physical conduct that a reasonable person would find threatening, intimidating or humiliating; or
- Gratuitous sabotage or undermining of a person’s work performance.

Any employee who believes that he or she has been bullied, is being coerced to participate in bullying or who has information about bullying conduct by a coworker, supervisor, agent, client/customer, vendor or other third party not employed by the Company should immediately provide a written or verbal report to Human Resources, his or her supervisor, or any other member of management.

If the employee’s supervisor is the individual about whom the employee has a complaint or concern, the employee should make a report to Human Resources.

The Company will conduct a prompt, thorough and objective investigation of any complaint of workplace bullying. The Company will endeavor to protect the privacy and confidentiality of all parties involved to the extent possible, commensurate with a thorough investigation. If a complaint of bullying is substantiated, appropriate disciplinary action, up to and including termination, will be taken.

The Company will not tolerate retaliation against any employee who makes a good faith complaint regarding workplace bullying.