Anti-Harassment & Discrimination Policy

Federal and state regulations and laws prohibit workplace harassment and discrimination. The purpose of these laws is to ensure that employees are treated fairly and that non-work conditions do not impact employment. GRID Alternatives and its Affiliates support these laws and regulations and wish to ensure that all employees can work without being subjected to unwanted harassment and discrimination. To this end, GRID Alternatives and its Affiliates established the following Anti-Harassment and Discrimination Policy. By signing below, each employee of GRID Alternatives and its Affiliates acknowledge their receipt and review of this policy.

GRID Alternatives and its Affiliates are committed to providing a workplace free of unlawful harassment and discrimination. GRID Alternatives and its Affiliates do not tolerate harassment or discrimination of their job applicants or employees by another employee, supervisor, or non-employee with whom GRID Alternatives (or its Affiliate) has a business, service or professional relationship. Harassment or discrimination of third parties by GRID Alternative or Affiliate employees is also prohibited. Any form of harassment or discrimination on the basis of race, color, sex, religion, disability, marital status, sexual preference, gender identity, medical condition, or any category protected by federal, state or local law is a violation of this policy and will be treated as a disciplinary matter. This policy also prohibits unlawful discrimination and/or harassment based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics. GRID Alternatives and its Affiliates have zero tolerance for any type of harassment and discrimination.

- **Discrimination Defined**
  Discrimination generally means treating individuals differently due to factors (such as race, sex, and national origin) unrelated to the individual’s ability and/or performance.

- **Harassment Defined**
  Harassment is unwelcome verbal, visual or physical conduct creating an intimidating, offensive, or hostile work environment that interferes with work performance. Examples of harassment include verbal (including slurs, jokes, insults, epithets, gestures or teasing), graphic (including offensive posters, symbols, cartoons, drawings, computer displays, or e-mails) or physical conduct (including physically threatening another, blocking someone’s way, etc.) that denigrates or shows hostility or aversion towards an individual because of gender or any other protected characteristic. Such conduct constitutes harassment when: (1) it has the purpose or effect of creating an intimidating, hostile, or offensive working
environment; or (2) it has the purpose or effect of unreasonably interfering with an individual’s work performance; or (3) it otherwise adversely affects an individual’s employment opportunities.

- **Sexual Harassment Defined**
  Sexual harassment can include all of the above actions as well as other unwelcome conduct such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal or physical conduct of a sexual nature when: (1) submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual’s employment; or (2) submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of substantially or unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive environment.

- **Harassment Complaint Procedure**
  The complaint procedure of GRID Alternatives and its Affiliates provides for an immediate, thorough and objective investigation of any claim of unlawful or prohibited harassment or discrimination, appropriate disciplinary action against one found to have engaged in prohibited harassment or discrimination, and appropriate remedies for any victim of harassment or discrimination.

If an employee believes he or she has been harassed or discriminated against, or if an employee is aware of the harassment or discrimination of others, the employee should promptly provide a report to his or her immediate supervisor. If the employee does not feel comfortable reporting the incident to his or her supervisor, the employee should contact his or her executive director. If the employee believes he or she has been harassed or discriminated against by the executive director, the employee should contact the President of GRID Alternatives’ or Affiliate Board of Directors, as applicable. Contact information for the President of the board must be made available to employees at all times by the GRID Alternatives Executive Director and each Affiliate Executive Director, as applicable, and can be found in the staff directory file on GRID Alternatives’ intranet. If possible, the complaint should be in writing and should be as detailed as possible, including details of the incident(s), the names of individuals involved, the names of any witnesses, direct quotations when language is relevant, and any documentary evidence (notes, pictures, etc.).

Every report of harassment and discrimination will be investigated thoroughly and promptly by GRID Alternatives or the applicable Affiliate. Affiliate Executive Directors must promptly notify the GRID Alternatives Executive Director of all reports of harassment and discrimination at their Affiliate. Upon completion of the investigation, a determination regarding the reported harassment will be made and communicated to the employee(s) who reported the harassment and to the accused harasser(s).
• **Discipline and Liability for Harassment or Discrimination**

If GRID Alternatives or the applicable Affiliate determines that unlawful harassment or discrimination occurred, GRID Alternatives or the applicable Affiliate will appropriately discipline the offender or offenders to deter any future harassment or discrimination. The appropriate discipline may include written or oral warnings, probation, suspension, reassignment, demotion or termination. If the unlawful conduct is the act of a non-employee, GRID Alternatives or the applicable Affiliate will attempt to ensure that such conduct is not repeated.

Likewise, any manager/supervisor who fails to promptly report unlawful harassment or discrimination and/or employee who knowingly provides false information in connection with a harassment/discrimination complaint or investigation may be subject to disciplinary action, up to and including termination.

GRID Alternatives and its Affiliates do not consider conduct in violation of this policy to be within the course and scope of employment or the direct consequence of the discharge of one’s duties. Accordingly, to the extent permitted by law, GRID Alternatives and its Affiliates reserve the right not to provide a defense or pay damages assessed against employees for conduct in violation of this Policy.

• **No Retaliation**

GRID Alternatives and its Affiliates prohibit any form of retaliation against individuals who report unwelcome conduct or who cooperate in the investigation of such reports. If an employee believes he or she is being retaliated against, the employee should report such conduct to his or her supervisor immediately. If the employee does not feel comfortable reporting the incident to his or her supervisor, the employee should contact the President of the Board of Directors of GRID Alternatives or the applicable Affiliate. In accordance with this policy, GRID Alternatives or the applicable Affiliate will take appropriate disciplinary action for any such retaliation, up to and including termination.

In addition to GRID Alternatives’ internal compliance procedure, employees should also be aware that the federal Equal Employment Opportunity Commission (EEOC) and applicable state agencies (in California, the Department of Fair Employment and Housing investigate and prosecute complaints of unlawful harassment in employment. Employees who believe that they have been unlawfully harassed may file a complaint with either of these agencies. The EEOC and your state employment agency serve as neutral fact finders and attempt to help the parties voluntarily resolve disputes.
RECEIPT OF ANTI-HARASSMENT & DISCRIMINATION POLICY

AFTER YOU HAVE READ THE ANTI-HARASSMENT AND DISCRIMINATION POLICY CONTAINED IN THE PRECEDING PAGES, SIGN AND RETURN THIS RECEIPT TO YOUR SUPERVISOR.

I received a copy of the Anti-Harassment and Discrimination Policy (the “Policy”). I have read and understand the Policy and agree to abide by it. I understand any employee who engages in conduct prohibited by the Policy will be subject to discipline, up to and including termination. I understand it is my obligation to refrain from engaging in conduct in violation of the Policy and also to report conduct which I believe is harassing or discriminatory to enable my employer to take appropriate action.

Print Name: ______________________

Signature: ______________________

Employer: ______________________

Date: ______________________

[Employee must sign and date Anti-Harassment and Discrimination and on 1st day of employment]