

## **EEO EMPLOYMENT POLICIES**

### **EQUAL EMPLOYMENT OPPORTUNITY (EEO)**

It is Company policy to seek and to employ the most qualified individuals from the available labor force and to provide them with an opportunity for advancement, including upgrading, promotion, training, and when necessary, discipline in a manner that does not discriminate because of race, color, religion, sex, age, national origin, ancestry, marital status, arrest and court record, disability, sexual orientation, gender identity or expression, genetic information, domestic or sexual violence victim status, credit history, citizenship status, veteran/military status, and/or other characteristics protected by state and federal laws, regulations and/or executive orders. This policy applies to all aspects of the employment relationship, including hiring, promotions, training, discipline, compensation, working conditions, and benefits.

As a federal contractor, we comply with Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, and the Vietnam Era Veterans' Readjustment Assistance Act. Accordingly, we not only prohibit unlawful discrimination, but we also take affirmative action to ensure that all individuals have an equal opportunity for employment, without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability or status as a Vietnam era, special disabled veteran, recently separated veteran, or other protected veterans who served during a war or in a campaign or expedition for which a campaign badge has been authorized.

If you believe that you have been subjected to discrimination or harassment due to a protected characteristic, you should immediately raise the issue with your manager/supervisor, Director of Human Resources, or the President.

It is also against Company policy for any person to retaliate against any individual because he or she has opposed a discriminatory practice or has filed a complaint, testified, or assisted in any proceeding regarding the discriminatory practices prohibited by this policy.

## **EMPLOYMENT AT-WILL**

All employees, except those who have individual written employment contracts for a definite period, are employed "at-will." **As an at-will employee, you or the Company may end the employee relationship at any time, for any reason, with or without cause or notice.** Nothing in this Handbook or in any other materials provided to applicants and employees in connection with their employment creates an express or implied contract concerning terms or conditions of employment. Any agreement that promises a specified period of employment, or that otherwise concerns any term or condition of employment must be in writing and must be signed by both you and the President of the Company.

## **HARASSMENT-FREE WORKPLACE POLICY**

CLH/PPP believes that every employee has the right to be treated with dignity and respect. Our policy is to provide a work environment free from harassment, including but not limited to harassment on the basis of race, sex, age, religion, color, ancestry, disability, genetic information, citizenship, national origin, veteran/military status, marital status, sexual orientation, arrest and court record, gender identity or expression, domestic or sexual violence victim status, credit history, and/or other grounds protected by state or federal law. Such harassment undermines the dignity of the workplace and is a form of misconduct that is prohibited and will not be tolerated.

Employees should recognize that harassment may occur in many ways:

- Between co-workers;
- Between supervisors and subordinates;
- Between employees and non-employees, such as vendors and customers;
- Between individuals of the same or differing race, religion, gender, or other protected classification;
- In the workplace;
- At Company events;
- Anywhere the Company conducts business;
- Outside the workplace on Company time; or
- Outside the workplace in a manner that affects the work environment.

The victim of harassment does not have to be the person the harassing conduct is directed toward; the victim may be another person offended by the observed harassment.

Employees who violate our policy prohibiting harassment may be subject to discipline, up to and including immediate discharge.

### ***SEXUAL HARASSMENT***

The Company strictly prohibits managers, directors, officers, partners, proprietors, and employees from sexually harassing: another manager, director, officer, partner, proprietor, or employee; a job applicant; or an individual doing business with the Company. Managers and supervisors are further prohibited from knowingly allowing a subordinate to engage in sexual harassment.

Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct or visual forms of harassment of a sexual nature constitute sexual harassment when:

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

Examples of prohibited conduct include but are not limited to:

- **Verbal Behavior:** sexual or suggestive comments, jokes, teasing or nicknames; remarks of a sexual nature or with sexual innuendo about a person's clothing or body; gossip regarding one's sexual activities/life; using foul or obscene language; demeaning comments about an individual's gender or gender identity; any sexual advance or propositioning an individual or repeatedly "asking out" or attempting to establish a relationship with an individual, who by word or conduct in any way indicates that such action is not welcome; sending offensive voicemail messages.
- **Nonverbal Behavior:** leering, ogling, obscene gesturing, or suggestive or insulting sounds; sending/circulating/displaying materials of a sexual nature including pornographic or suggestive posters, pictures, cartoons, objects, or offensive letters, poems, texts, email messages, or social media posts.
- **Physical Behavior:** any unwelcome touching, such as groping, patting, pinching, hugging, massaging, kissing, or brushing up against the body of another.

- Abuse of Power: conditioning an employee's receipt of a benefit or favorable working condition or foregoing an adverse employment action (such as discipline, a pay cut, demotion, etc.) based upon an employee's submission to sexual conduct or in exchange for sexual favors. Coercing an employee into submitting to sexual conduct by providing preferential treatment.

### ***OTHER FORMS OF HARASSMENT***

In addition to sexual harassment, the Company also prohibits harassment based on other protected characteristics, such as race, age, religion, color, ancestry, disability, genetic information, citizenship, national origin, veteran/military status, marital status, sexual orientation, gender identity or expression, arrest and court record, domestic or sexual violence victim status, credit history, or other grounds to the extent they are protected by state and/or federal laws.

Prohibited harassment includes offensive conduct directed towards an individual because of a protected characteristic. Examples of harassment include slurs, epithets, offensive jokes, physical assaults or threats, intimidation, mockery, insults, offensive objects or pictures, interference with work performance, or other unwelcome conduct that is offensive and hostile. Employees who engage in inappropriate conduct in violation of our harassment policy may be subject to discipline, up to and including discharge.

### ***COMPLAINT PROCEDURES***

It is the responsibility of everyone to create an atmosphere free of unlawful discrimination and harassment, sexual or otherwise. If you are the target of harassment or have observed offensive conduct that violates our harassment/sexual harassment policy, report the incident(s) to your manager/supervisor or the Director of Human Resources. Managers and supervisors should immediately report employee complaints or their own firsthand observations of harassment to the Director of Human Resources. If your manager/supervisor or the Director of Human Resources is the alleged offender, is unavailable, or if you do not feel comfortable reporting your concerns to these individuals, bring the matter to the attention of the President of CLH/PPP.

Although we require everyone to report all incidents of harassment, we prohibit maliciously false complaints of harassment. Employees who file maliciously false reports of harassment may be subject to discipline up to and including unpaid suspension and/or immediate termination.

### ***INVESTIGATION PROCEDURES***

It is our policy to investigate each report in a prompt, thorough, fair, discreet, and impartial manner. Due to the personal and sensitive nature of harassment complaints, the Company's investigations are conducted confidentially and discreetly to the extent possible, and the nature of the complaint is provided to those on a need-to-know basis only.

When evaluating whether a violation of our policy prohibiting sexual harassment has occurred, the "reasonable person of the same gender standard" should be used. This means, for example, that if the alleged victim of harassment is a woman, our investigation should analyze the incident(s) from the perspective of a reasonable woman.

### ***RETALIATION***

To encourage you to report prohibited harassment, the Company takes a strong stance against retaliation. Managers, directors, officers, partners, proprietors, and employees are prohibited from retaliating against any individual who has complained of sexual or other harassment/discrimination, conducted an investigation of a complaint, acted as a witness in the investigation, or opposed an employment practice he or she reasonably believes constitutes unlawful discrimination/harassment.

### ***DISCIPLINE***

Should the investigation determine that an individual has violated our policy prohibiting sexual and other harassment, it is Company policy to take immediate, appropriate corrective action to end the harassment. That corrective action may result in disciplinary action, up to and including unpaid suspension and/or immediate termination of employment.

### ***Training***

To ensure proper enforcement and understanding of our harassment and sexual harassment policies, managers and supervisors are required to attend annual training on these policies.

Any questions regarding this policy should be referred to the Director of Human Resources.

## **REASONABLE ACCOMMODATIONS**

We provide reasonable accommodation to qualified individuals with a disability, for an individual's religious beliefs or practices, for individuals with known limitations related to pregnancy, childbirth, or related conditions, and for victims of domestic or sexual violence victim status. The Company may request and require verification of the employee's need for such accommodation to the extent permitted by law. If you use medical marijuana in accordance with Hawaii law, you may request reasonable accommodation for such use before you submit to any company-requested employment drug testing and/or substance abuse testing. That means that any time before you present yourself to a collection site to provide samples of specimens for the purpose of drug testing, you may request reasonable accommodation for the use of medical marijuana in accordance with Hawaii law, and the Company will engage in the interactive process with you to determine what accommodation can be provided to you to the extent required by law. Please contact Human Resources if you require or have any questions regarding reasonable accommodation.

## **WHISTLEBLOWER POLICY**

The Company adheres to all applicable federal, state, and county laws.

Employees are encouraged to immediately report observations of the Company's violation of any law, or a violation of any state, county, or federal contract. The report should be made to the employee's supervisor, the Department Manager, the Director of Human Resources, or the President so that the Company may investigate and correct the situation.

The Company prohibits retaliation against an employee because he or she (or a person on his or her behalf) reports or is about to report to the Company or to the government a violation or a suspected violation of any law, or a violation of a state, county, or federal contract. Knowingly false reports, however, will not be tolerated. We further prohibit retaliation against an employee who is requested by the government to participate in an investigation, hearing, or inquiry held by a public body, or in a court action.

If any employee feels that he or she is the target of retaliation in violation of this policy, the employee should immediately report the problem to his or her immediate supervisor, the Department Manager, the Director of Human Resources, or the President.

## **PRODUCTIVE WORK ENVIRONMENT/ WORKPLACE VIOLENCE POLICY**

CLH/PPP strives to create a safe work environment and will not tolerate verbal and/or physical intimidation, harassment, violence, or threats of violence toward any of its employees.

Any employee who believes that the actions or words of a supervisor, fellow employee, customer, supplier, or vendor constitute intimidation, harassment, or threat of violence is encouraged to report the conduct as soon as possible to their supervisor or Human Resources.