

## **Equal Employment Opportunity Statement**

Span is committed to complying with all federal, state, and local laws providing for equal employment opportunities, as well as all laws related to terms and conditions of employment. The Company desires to maintain a work environment that is free of harassment and discrimination due to race, color, religion, sex (including sexual orientation, gender identity, or pregnancy), national origin, older age (beginning at age 40), disability, or genetic information (including family medical history), or any other status protected by federal, state, or local laws. The Company will make reasonable efforts to accommodate those physical or mental limitations of an otherwise qualified employee unless undue hardship would result for the Company.

This standard is reflected in all of Span's practices and policies regarding hiring, training, promotions, transfers, layoffs, organizing the work force, rates of pay, and other forms of compensation.

## **Anti-Harassment/Anti-Discrimination Policy**

Span is committed to a work environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Span expects that all relationships among persons in the office will be business-like and free of bias, prejudice, and harassment. Improper interference with the ability of Span employees to perform their expected job duties is not tolerated.

Span encourages reporting all perceived incidents of discrimination or harassment. It is the policy of Span to investigate such reports promptly and thoroughly. Span prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

### **Definitions of Harassment**

Sexual harassment constitutes discrimination and is illegal under federal, state, and local laws. For the purposes of this policy, sexual harassment is defined, in the Equal Employment Opportunity Commission Guidelines, as "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature," when, for example; a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling, or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal, or visual conduct of a sexual nature.

Harassment based on any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written, or physical conduct that denigrates or shows hostility or aversion toward and individual or their relatives, friends, or associates based on race, color, religion, sex (including sexual orientation, gender identity, or pregnancy), national origin, older age (beginning at age 40), disability, or genetic information (including family medical history), or any other status protected by federal, state, or local laws and that a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; b) has the purpose or effect of unreasonably interfering with an individual's work performance; or c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs, or negative stereotyping; threatening, intimidating, or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated via emails, phone and voicemail messages, text messages, tweets, blogs, social media posts/comments, or other methods.

### **Individuals and Conduct Covered**

These policies apply to all applicants and employees, whether related to conduct engaged in by fellow employees or someone not directly employed by Span (e.g., employees family member, client, board member, volunteer, government official, or vendor).

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting or among coworkers outside the workplace, such as during business trips, business meetings, and business-related social events.