



CORPORATE OFFICE
18100 DAIRY LANE
JORDAN, MN 55352
PH (952) 447-6025
FAX (952) 447-1000

January 1, 2023

ABHE & SVOBODA, INC.
SEXUAL HARASSMENT AND OFFENSIVE BEHAVIOR POLICY

TO: ALL INDIVIDUALS

It is the Company's policy to maintain a work environment free from discrimination and from offensive or degrading remarks or conduct. Such behavior includes inappropriate remarks about or conduct related to an individual's age, race, color, religious creed, gender, marital status, sexual orientation, gender identity and transgender, national origin, disability, military and veteran status, or any other personal characteristic determined to be a protected category under applicable federal or state law or as required by local ordinance. Offensive behavior prohibited by this policy also includes requests to engage in illegal, immoral or unethical conduct or retaliation for the making of a complaint.

One specific kind of illegal and offensive behavior is sexual harassment. Sexual Harassment, which can consist of a wide range of unwanted and unwelcome sexually directed behavior is defined as unwelcome sexual advances or requests for sexual favors or other verbal or physical acts of a sexual or sex based nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, or;
- Submission to or rejection of such conduct is used as a basis for an employment decision, or;
- Such conduct has the effect of substantially interfering with an individual's work or performance or creates an intimidating, hostile or offensive working environment.

Offensive behavior, including harassment and discrimination, by an employee, supervisor, manager or non-employee is not acceptable. Every individual will be expected to comply with this policy and take appropriate measures to ensure that such conduct does not occur. Appropriate disciplinary action as legally allowed for each type of individual will be taken against any individual who violates this policy against offensive behavior. Based on the seriousness of the offense, disciplinary action may include, but is not limited to, a verbal or written reprimand, suspension, immediate termination or cancellation of a contract.

It is the goal of this policy to ensure that all complaints of offensive behavior will be fairly, timely, and thoroughly investigated by an impartial qualified person; all parties are accorded appropriate due process; and conclusions are based on the evidence collected. To attain that goal, all individuals are on notice that:

- The reporting and investigative procedures of the company are designed to encourage a timely report of an act of offensive behavior;
- Complaints, investigations and resolutions will be handled as discreetly as possible with information being shared only with those who have a need to know and as may be required by law;
- Retaliation against any person who complains reports or testifies about offensive behavior, or participates in an investigation of an offensive behavior complaint in good faith is not acceptable;
- All individuals, supervisors and members of management shall cooperate fully with the investigation. Failure to cooperate or impeding the investigation is not acceptable;
- Reports made of harassment in violation of this policy in bad faith are not acceptable;
- The reporting individual will receive a timely response and resolution to the investigation;
- The company will document and track the complaint's progress; and
- A violation of the policies described in any of the above items, as determined after appropriate investigation, will result in disciplinary action, including immediate termination.

Any person who feels he or she is being subjected to offensive or discriminatory behavior should feel free to object to the behavior and report that behavior to their immediate supervisor, EEO Officer or Human Resources. Any supervisor who received an offensive behavior complaint or who has reason to believe offensive behavior is occurring shall report these concerns to the Equal Employment Officer as directed in the Equal Opportunity Policy Statement.

Employees are encouraged to report conduct that they believe may be prohibited harassment (or that, if left unchecked, may rise to the level of prohibited harassment), even if they are not sure that the conduct violates this policy.

We understand concerns may not be brought to our attention because employees are reluctant to get coworkers in trouble. This can have the unintended outcome that when a complaint is ultimately made by another employee the coworker is subjected to harsher punishment. Any person can informally share information with the EEO Officer about harassment concerns without filing a complaint. We will then remind the individual about our policies and provide any additional training such concerns merit.

If you have any concerns or complaints regarding this policy, our complaint system, or training please contact the EEO Officer.

Gail Svoboda, President - Treasurer

Tom Stockert, Equal Employment Opportunity Officer