



Glosten

Glosten Policies, Procedures, and Guidelines

EQUAL OPPORTUNITY/AFFIRMATIVE ACTION POLICY

Equal Employment Opportunity

Glosten is proud to provide equal employment opportunity to all employees and applicants for employment. In order to provide equal employment and advancement opportunities to all individuals, employment decisions will be based on merit, qualifications, abilities, and the business needs of the Company. Glosten does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, disability, or status as a protected veteran in accordance with applicable state and federal laws. This policy applies to all terms and conditions of employment, including, but not limited to, selection, recruitment, hiring, job assignment, promotion, training, benefits, compensation, disciplinary action, and separation.

If you have questions or concerns about discrimination in the workplace, you are encouraged to bring these issues to the attention of your supervisor or the Human Resources representative. You can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

Disability Accommodation

In accordance with state and federal law, Glosten will make reasonable accommodations if you have a disability that affects your ability to work. All employees must be able to perform their job duties properly, with or without reasonable accommodation.

If you have a disability that affects your ability to work or perform any of your job duties in a proper and satisfactory manner, including your ability to arrive at work regularly and promptly, and you need an accommodation, you are strongly encouraged to discuss your circumstances with the Human Resources representative. The Human Resources representative will treat such information as confidential, except to the extent that other employees need to know to evaluate your request for an accommodation or to accommodate your disability.

The Company may also request medical opinions to verify your disability and/or your need for an accommodation, to identify potential reasonable accommodations, or to determine whether your continued work would pose a safety or health risk.

Prohibition of Discrimination, Harassment, and Retaliation

Glosten expects all employees to perform their work in a respectful and professional manner, with a concern for the well-being of their co-workers. Glosten is committed to providing a work environment that is free from discrimination and harassment and where all employees are treated with respect. Glosten expressly prohibits any form of employee discrimination and harassment based on race, creed, color, sex, religion, age, marital status, sexual orientation, national origin, citizenship status, any sensory, mental or physical disability, veteran or military status, or any other legally protected category under state and federal laws. Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings, and business related social events. Engaging in conduct prohibited by this policy may be cause for disciplinary action up to and including termination.

Harassment is a form of discrimination. The term “harassment” means unwelcome, annoying, or offensive conduct directed at an employee based on an employee’s legally protected trait or status. Such prohibited harassment includes:

- Demanding sexual favors in exchange for favorable reviews, assignments, promotions, continued employment or promises of the same.
- Basing personnel decisions on an employee’s response to sexually oriented requests.
- Remarks, teasing, insults, gestures based on any protected category.
- Display or circulation of written, electronic, or digital text, materials or pictures which are sexually suggestive or offensive in nature.
- Continued or repeated jokes, language, epithets, flirtations, advances, or propositions.
- Verbal abuse of a sexual or other harassing nature.
- Graphic verbal commentary about an individual’s body or sexual activities and use of sexually degrading or vulgar words.
- Leering, whistling, touching, and other unwanted sexual or physical contact.
- Any other conduct that in the Company’s sole discretion is derogatory or offensive and based on an employee’s protected trait or status.

Reporting Complaints of Discrimination/Harassment and Prohibition of Retaliation

In order to accomplish our goals of creating and maintaining a work environment free of illegal discrimination and harassment, addressing claims of discrimination or harassment, and preventing retaliation against any person who brings forward a claim or participates in the investigation of a claim of discrimination or harassment, we need your help.

Complaints of discrimination or harassment will be investigated promptly and as confidentially as possible, and the rights of all individuals will be protected in the process.

If the investigation reveals that there has been a violation of the policy, the offending employees will be disciplined in the appropriate manner, up to and including termination.

If you feel that you or another employee has been discriminated against or harassed, you must report it. If you are comfortable doing so, you are encouraged to address the issue with the offending person, identify the offensive conduct, and request that it stop. If you are not

comfortable addressing the issue with the offending person or if the offensive conduct does not stop, you must bring the issue to the attention of your group lead or the Human Resources representative. If you believe that you or another employee is experiencing discrimination or harassment prohibited by Company policies, it is your responsibility to report it to your supervisor or the Human Resources representative.

All complaints of discrimination or harassment and the terms of their resolution will be kept as confidential as possible. Glosten prohibits retaliation against anyone for making such a complaint or for participating in an investigation. If you believe that you have been subjected to retaliation for making such a complaint or for participating in an investigation, or if you observe that another employee has been subjected to such retaliation, you must report the matter immediately by contacting your supervisor or the Human Resources representative.

Any questions regarding this policy should be directed to the Human Resources representative.

Reporting Employee Misconduct and Prohibition of Retaliation

Glosten strives to promote a work environment that adheres to legal requirements and reflects ethical conduct. If you suspect that another employee or manager is engaging in conduct in the course of work which is dishonest, fraudulent, or violates any law or public policy under state or federal law, you are encouraged to bring the matter to the attention of your supervisor or the Human Resources representative. You need not first address the issue with the offending employee.

All complaints under this policy will be investigated promptly and as confidentially as possible, and the rights of all individuals will be protected in the process.

If the investigation reveals that there has been a violation of the policy, the offending employees will be disciplined in the appropriate manner, up to and including termination.

Glosten prohibits retaliation against any employee for making a complaint or for participating in an investigation under this policy. If you believe that you have been subjected to retaliation for making such a complaint or for participating in an investigation, or if you observe that another employee has been subjected to such retaliation, you must report the matter immediately by contacting your supervisor or the Human Resources representative.

Any questions regarding this policy should be directed to the Human Resources representative.