



Non-harassment Policy – All Employees



Document Name	Anti-Harassment/Discrimination Policy – All Employees
Version	Two
Issue/Revision Date	July 31, 2020
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PURPOSE:

Xact Data Discovery and its companies (hereinafter, known as XDD) is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, XDD expects that all relationships among persons in the office will be business-like and free of explicit bias, prejudice and harassment. XDD has developed this policy to ensure that all its employees can work in an environment free from unlawful harassment, discrimination and retaliation.

WHO IS GOVERNED BY THIS POLICY:

This Policy covers all Employees.

POLICY STATEMENT:

XDD prohibits employment discrimination and harassment on the basis of race, color, religion or creed, national origin or ancestry, sex, age, physical or mental disability, veteran status, genetic information, pregnancy, sexual orientation, gender identity, and citizenship. Retaliation for good-faith reporting of violations or participating in related investigations is prohibited. In addition to the federally protected classes, employees should be aware that many states or jurisdictions may have additional protected classes.

XDD will train employees on recognizing harassment and discrimination, and will thoroughly investigate and resolve complaints appropriately in accordance with federal, state, and local laws.

POLICY ELEMENTS:

Prohibitions

1. XDD will not discriminate: we will not make employment decisions based on an employee’s legally protected status.

2. XDD prohibits harassment of any employee by another employee, supervisor or third party for any reason [“protected class”] including, but not limited to: veteran status, uniform service member status, race, color, religion or creed, sex, national origin or ancestry, age, physical or mental disability, sexual orientation, gender identity, or any other protected class under federal, state or local law. Harassment of third parties by our employees is also prohibited. Harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her protected class. Examples include, but are not limited to:
 - Touching, hugging, invading one’s space, assault, slurs, threats, jokes or teasing, unwelcome sexual advances or flirting; inappropriate, threatening or teasing words in person or through texts, e-mails, posts, pictures, or gestures.



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We firmly prohibit sexual harassment of any employee by another employee, supervisor or third party. Harassment of third parties by our employees is also prohibited. Illegal Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example:

- submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment,
- submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or
- 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.

Before it becomes a serious problem and the conduct interferes with an individual’s work performance or creates a hostile environment, employees are strongly encouraged to **notify the HR Director or a member of management** of conduct that may violate this policy. Inappropriate behavior on the basis of a legally protected class, even if it doesn’t rise to the level of illegal, shall be investigated and addressed accordingly.

This policy applies not only to the workplace on company time or using company equipment, but also to business travel, behavior between employees off work, and work-related social functions, even if the activities are held off site.

3. Retaliation for good-faith reporting of violations or participating in related investigations is prohibited.

Reporting

XDD encourages reporting of all perceived incidents of discrimination, harassment, or retaliation. Any employee who believes he or she has been harassed or witnesses harassment should report the situation immediately to the Human Resources Director or a member of the leadership team. If a report is given to a member of management, that manager must discuss the report with the Human Resources Director timely for investigation.

Investigation

The Human Resources Director will lead or complete all investigations into any reports as promptly and confidentially as possible. Reports of this nature are taken seriously and investigated thoroughly.

The company recognizes that every investigation requires a determination based on all the facts in the matter. We also recognize the serious impact a false accusation can have. We trust that all employees will continue to act responsibly and in good faith.



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Retaliation and Resolution

Violations of this policy will be addressed according to the severity of the violation, and may result in disciplinary action, up to and including discharge.

Adverse action will not be taken against an employee because he or she, in good faith, reports or participates in the investigation of a violation of this policy. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action, up to and including discharge. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Training

Each employee will be trained on a regular basis of XDD’s policy and expectations.

Any employee who has questions or concerns about this policy should talk with the Director of Human Resources or the General Counsel.