

Spherion - Workplace Harassment Policy / Protection Against Retaliation / Reporting of Complaints

WORKPLACE HARASSMENT: Spherion is committed to providing a work environment free of unlawful harassment. Verbal or physical conduct unlawfully directed at an applicant or employee because of his/her race, color, religion, ancestry, national origin, age, sex (including pregnancy), sexual orientation, gender identity, marital status, disability, veteran status, service in the uniformed services, citizenship status, genetic information or any other status protected by applicable law, or because he/she engaged in any legally protected activity, is strictly prohibited and will not be tolerated by Spherion. Such harassment (1) creates an intimidating, hostile or offensive working environment; (2) unreasonably interferes with work performance or advancement opportunities; and/or (3) otherwise adversely affects an individual's employment opportunities. Harassment may take many forms, including, but not limited to, epithets, abusive language, comments, slurs, jokes, displays, innuendos, cartoons, pranks or physical advances. This prohibition of unlawful harassment covers conduct in any workplace context including conferences, work-related activities/social events, and work-related trips as well as harassment from managers, co-workers and non-employees with whom Spherion employees have a business relationship, including, but not limited to, vendors, clients and client employees.

Sexual Harassment. Sexual harassment refers to sexual behavior that is not welcome and is offensive. Such behavior is strictly prohibited and will not be tolerated. Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct that is based on an individual's sex or is of a sexual nature constitutes sexual harassment when any of the following occur or are present:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of employment;
2. Submission to or rejection of such conduct is used as the basis for employment decisions; and/or
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work or performance or creating an intimidating, hostile or offensive working environment.

Because our Spherion employees typically work at client sites and Spherion is unable to know or control many aspects of client work environments, it is imperative that you report to your Spherion Representative or the Spherion Call Center at 1.888.218.4417 any discrimination, harassment or retaliation you may witness or experience.

PROTECTION AGAINST RETALIATION: Spherion will not tolerate retaliation against any person who makes a complaint, opposes a practice, provides information, cooperates in an investigation, or participates in a proceeding concerning an actual violation (or a reasonably held belief of a violation) of federal, state or local laws, including, but not limited to, anti-discrimination, anti-harassment, workplace health and safety, wage and hour, employee benefits, leave of absence (including sick leave), anti-trust, anti-bribery, privacy, securities laws,

the Patient Protection and Affordable Care Act and other applicable laws. No retaliation is tolerated even when the alleged violation ultimately is determined to be unfounded.

Spherion also will not tolerate retaliation against any person who requests an accommodation of a disability or religious belief, or exercises, or seeks to exercise any rights or protections to which they are entitled by applicable federal, state or local laws.

COMPLAINT AND INVESTIGATION PROCEDURES:

Reporting of Complaints. Spherion encourages and expects employees to report incidents of discrimination, harassment or retaliation whether they are directly involved or are a witness. Any employee who believes that (i) he or she is being subjected to discrimination, harassment or retaliation by a co-worker, supervisor, manager or other individual at the workplace; (ii) his or her employment is being adversely affected by such conduct; or (iii) believes that he or she has witnessed such conduct, should immediately report such concerns to his or her Spherion Representative (your first point of contact). Should a representative of Spherion not be available or you feel you need another resource, you are encouraged to contact the Spherion Call Center at 1.888.218.4417, 8 a.m. – 8 p.m. (EST), Monday - Friday.

Investigation. After a complaint of discrimination, harassment or retaliation is received, a prompt and impartial investigation will be conducted and, in the event the complaint is found to have merit, appropriate corrective steps will be taken which may include disciplinary action up to and including discharge of any Spherion employee engaged in such wrongdoing. Our investigative procedures may also involve the HR Representatives, managers and employees of a client or other third parties (such as vendors) when the complaint involves anyone who is not employed by Spherion. All complaints will be handled in a discreet manner and information will be limited to those personnel with a need to know.

Expectations of Individuals Involved in or Witnesses to an Incident. The person complaining, the respondent, managers, and any other individual who is a witness to, or hears about an incident are expected to cooperate in the investigation of the matter, including acting in good faith to provide any and all information as requested that would aid in the investigation.