



Stenson Tamaddon Bullying, Harassment, and Discrimination Policy

February 2, 2024

I. Introduction.

1. StenTam is dedicated to maintaining a positive, creative, diverse, inclusive, and supportive work environment. Bullying, harassment, and discrimination have a detrimental effect on StenTam, our employees, clients, business partners, and our brand. Such behavior creates an unsafe working environment, harms morale and results in the loss of talented and trained staff, causes the breakdown of teams and individual relationships, and reduces efficiency and productivity. Accordingly, StenTam strictly prohibits any bullying, harassment, and discrimination.

2. StenTam provides equal employment opportunities to all qualified candidates and employees and never tolerates any form of discrimination, harassment, or bullying against or by any employee, contractor, agent, applicant, client, or business partner based on race, gender, religion, sexual orientation, gender identity, national origin, age, pregnancy, physical or mental disability, military/veteran status, marital status, political affiliations, or any other consideration made unlawful by applicable law.

Policy Statement.

II. Definitions

1. “Bullying” means conduct that is so offensive, severe, or pervasive that it interferes with an individual’s participation in the workplace and includes, but is not limited to, verbal abuse, use of denigrating language, or physical intimidation. Bullying can occur face-to-face, in a group setting, through social media or email, or through gossip.

2. “Covered Person” means any employee, applicant, executive, contractor, or agent acting for or on behalf of StenTam.

3. “Discrimination” means to treat a person differently, or less favorably, for some reason or as otherwise defined by any applicable law.

4. “Harassment” means any unwanted conduct (sexual or otherwise) that has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive work environment and includes, but is not limited to, verbal (e.g., slurs, jokes, insults, epithets, gestures, or teasing), visual (e.g., offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts, or e-mails) or physical conduct (e.g., physically threatening another, blocking a person’s movement or route, etc.)

5. “Sexual harassment” means offensive or unwelcome conduct, whether direct or subtle, based on a person’s sex or gender and includes, but is not limited to, offensive remarks about a person’s sex or gender (e.g., obscene or vulgar gestures, posters, or comments, sexual jokes or comments about a person’s body, sexual prowess, or sexual deficiencies, sexually explicit e-mails, text messages, or voicemails); offensive or unwelcome sexual advances (e.g., unwelcome flirtations, propositions, leering,

whistling); requests or demands for sexual favors (whether in exchange for favorable treatment or not); or other verbal or physical conduct of a sexual nature (e.g., touching, pinching, assault, blocking normal movement, conversations about one's own or someone else's sexual relations, etc.). Offensive and unwelcome behaviors may constitute sexual harassment regardless of the intention of the person engaging in the conduct.

III. Policy

1. Scope. This Policy applies to all Covered Persons and to any conduct or behavior that occurs in the workplace. In addition, this Policy applies to Company activities occurring off premises (including, but not limited to, remote work, social media, or off-premise functions) when such conduct or behavior creates a hostile work environment or violates this Policy.

2. Zero Tolerance for Bullying, Harassment, or Discrimination. StenTam firmly believes that every person is entitled to be treated with dignity and respect and free from the demoralizing effects of bullying, harassment, or discrimination. Accordingly, bullying, harassment, or discrimination of any kind by any Covered Person occurring in the workplace or against any Covered Person, client, business partner, or third party is strictly prohibited, will not be tolerated. Those found to have engaged in such conduct can expect to be disciplined, up to and including termination of employment.

3. Prohibition Against Discrimination:

a. StenTam strictly prohibits discrimination against any Covered Person based on non-work-related personal characteristics, such as age, gender, race, ethnic, background, sexual orientation, gender identity, national origin, or religious beliefs.

b. Equal Employment and Opportunity. StenTam is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable federal, state or local laws. This Policy applies to all employment decisions, including but not limited to those involving recruitment, hiring, placement, promotion, training, compensation, benefits, transfer, discipline, demotions, suspensions, discharge, recall from layoff, reemployment, employee activities and access to facilities and programs, and general treatment during employment. All StenTam employees, contractors, and agents are prohibited from engaging in unlawful discrimination.

c. Americans with Disabilities Act.

(1) StenTam is fully committed to complying fully with the Americans with Disabilities Act, as amended (“ADA”) and all applicable state and local fair employment practices laws, and to ensuring equal opportunity in employment for qualified persons with disabilities. Consistent with this commitment, we provide reasonable accommodation to qualified individuals with a disability and to individuals with needs related to their religious observance or practices. What constitutes reasonable accommodation depends on individual circumstances and is addressed on a case-by-case basis. In all cases, however, StenTam endeavors to create a working environment in which individuals with special or unique needs feel they are being reasonably accommodated with dignity and respect.

(2) Any employee who believes he/she requires an accommodation to perform the essential functions of the job should contact Human Resources and request such accommodation. Employees may request accommodations orally or in writing, though the Company encourages employees to make their request in writing and to include information about: (a) the accommodation requested; (b) the reason the accommodation is needed; and (c) how the requested accommodation will help the employee perform the essential functions of their job.

(3) StenTam will then engage in an interactive dialogue with the employee to determine the precise limitations of their asserted disability and explore potential reasonable accommodations that could overcome those limitations. The Company encourages employees to suggest specific reasonable accommodations that they believe would allow them to perform their job. However, the Company is not required to make the specific accommodation requested and may provide an alternative effective accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on the Company. If a disability or need for accommodation is not obvious, then StenTam may ask the employee to provide supporting documents showing the employee has a disability within the meaning of the ADA and/or applicable state or local laws, and that the disability necessitates a reasonable accommodation. The Company will keep confidential any medical information obtained in connection with your request for a reasonable accommodation.

4. Speak Up and Zero Tolerance for Retaliation. Consistent with our Anti-Retaliation Policy, StenTam encourages individuals to speak up and report anything that may violate this Policy (or any law or other Company policy) without fear of retaliation. StenTam has zero tolerance for retaliation in any form. Anyone engaging in retaliatory behavior against those who make a report in good faith will be subject to disciplinary action, up to and including termination. If you believe you have been subjected to any retaliation, then you should report it, as set forth in Anti-Retaliation Policy.

5. Investigations. Allegations of bullying, harassment, or discrimination are taken very seriously and are appropriately, thoroughly, and promptly investigated. When reported, such incidents are investigated with an effort to keep the source of the report confidential, with the disclosure of information only as appropriate to facilitate the

investigation or resolution of the matter. Where inappropriate conduct has been verified to have occurred, specific disciplinary actions—where appropriate—are implemented.

IV. Training.

StenTam provides training to new employees and Covered Persons, including courses that address our Code of Ethics, our policy against bullying, harassment, or discrimination, and our Speak Up program. All new employees and Covered Persons are required to complete this training when onboarding, on an annual basis, or as otherwise directed by the Company.

V. Violation of this Policy.

Violation of this policy may result in disciplinary action, up to and including termination of employment.

The StenTam Human Resources is the proponent of this policy. Any questions concerning this policy should be addressed Human Resources.