

Wieland Holdings, Inc. Prohibition of Harassment Policy

Effective Date: 06/20/2020

Purpose

Wieland Holdings, Inc. and its wholly owned subsidiaries (the „Company“) are committed to fostering a working environment in which all individuals are treated with respect and dignity. Every employee has the right to work in an atmosphere that is free from discrimination and harassment. The purpose of this policy is to inform all Company employees of the Company’s prohibition on harassment and the required procedure to report any such conduct.

Company Prohibition of Harassment Statement

Harassment is offensive and unwelcome conduct based on an individual’s race, color, religion, gender (sex), sexual orientation, gender identity or expression, national origin, ethnicity, age, disability, genetic information, marital status, status as a covered veteran, or other characteristic protected by federal, state or local law. The Company strictly prohibits and does not tolerate harassment against applicants for employment, employees, contractors, and individuals with whom the Company interacts and/or conducts business, such as outside vendors, consultants or customers by anyone, including supervisors, co-workers or even non-employees. Employees who violate this policy shall be subject to appropriate disciplinary action, up to and including termination of employment.

Scope and Applicability

The Company complies with applicable federal, state and local laws governing non-discrimination, including harassment, in employment at every location in which the Company has facilities. Conduct prohibited by this policy also extends to any work-related setting outside the workplace.

Company Business Practices

Harassment Defined Harassment means any unwelcome verbal or physical conduct which is based upon an individual’s race, color, religion, gender (sex), sexual orientation, gender identity or expression, national origin, age, disability, genetic information, marital status, status as a covered veteran, or other protected characteristic covered by federal, state or local law (“Protected Characteristic(s)”) that alters the terms and conditions of employment. Harassment may arise from verbal statements or physical actions or both directed at or in the presence of any employee. It may arise from a single incident or from a pattern of behavior which has the purpose or effect of creating a hostile, offensive, or intimidating work environment. Harassment can occur even if the unwelcome conduct was not intended to be harassing or offensive.

Examples of Harassment Harassment encompasses a broad range of unwelcome verbal or physical behavior which, for example, may include but is not limited to:

- physical or mental abuse,
 - epithets, slurs, insults, or jokes based on any Protected Characteristic,
 - intimidation, threatening, or any other hostile act relating to a Protected Characteristic,
 - taunting intended to provoke an employee,
 - written or graphic material that denigrates or shows hostility or aversion toward an individual or group based on a Protected Characteristic,
 - conditioning hiring, promotion, assignment, or similar action on acceptance of harassing conduct;
- or

- online conduct, such as derogatory statements posted to any social media platform including, but not limited to, Facebook, LinkedIn, Twitter, and/or Instagram that includes any of the aforementioned examples of harassment is also prohibited by this policy.

Sexual Harassment Defined Sexual Harassment is a specific form of prohibited harassment. Sexual harassment means any harassment based on someone's actual or perceived sex, gender, or sexual orientation. It may arise where words or conduct create a hostile environment regardless of whether the words or conduct were directed to a member of the same or the opposite sex, regardless of whether the harasser is sexually attracted to the victim, and regardless of whether the words or conduct were intended to create a hostile work environment. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex, gender, or sexual orientation), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature, when any of the following is true:

- Submission to the advance, request, or conduct is made either explicitly or implicitly a term or condition of employment.
- Submission to or rejection of the advance, request, or conduct is used as a basis for employment decisions.
- Such advances, requests, or conduct have the purpose or effect of substantially or unreasonably interfering with an employee's work performance by creating an intimidating, hostile, or offensive work environment.

Examples of Sexual Harassment Sexual Harassment encompasses a broad range of physical or verbal acts which may include, but are not limited to the following examples:

- (1) Verbal—Making unwelcome sexual advances, requesting sexual favors, using sexually vulgar language, telling dirty jokes, making remarks about an individual's anatomy or sexual attributes, commenting about a person's sexuality, sexual experiences or about sexual matters, making sexual noises, making derogatory comments about gender, making repeated unwelcome requests for dates or other propositions, stating or implying that a particular employee's advances in employment have resulted or will result from the granting of sexual favors or the establishing or continuance of a sexual relationship, stating or implying that a particular employee's deficiencies in performance are attributable in whole or in part to the sex of that person, commenting on particular characteristics associated with a particular sex, or engaging in other verbal conduct of a sexual nature with a member of the same or the opposite sex;
- (2) Physical—Touching in a sexual manner or invading personal privacy, making sexual gestures, staring at a person's body, other unwanted touching such as pinching, patting, fondling, grabbing, brushing against or poking;
- (3) Quid pro Quo—Explicitly or implicitly conditioning any aspect of an employee's employment on the employee's response to unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature; and
- (4) Displaying or Distributing Inappropriate Material—Distributing written or graphic sexual material whether by e-mail or through hard copies, displaying of sexually-oriented magazines, posters, or photographs.

Reporting Procedures

If you believe you or a co-worker has been subjected to harassment you must **immediately** notify any of the resources identified below:

- Your supervisor;
- Your department head;

- The Human Resources Department;
- The Legal Department;
- The Company's Helpline (available anytime) or on the Web at www.globalbrassethics.com
For Employees in the United States: 1-866-784-7841
For Employees in Mexico: 001-800-613-2737

Immediate reporting is required to ensure that the Company may take prompt corrective action as may be appropriate. To assist in its investigation, the Company strongly encourages the submission of a written complaint detailing the nature of the harassment and the identity of the alleged harasser(s). In addition to reporting all harassing behavior, employees should communicate to the alleged harasser that the conduct that they have experienced or witnessed is unwelcome.

Investigation and Corrective Action

The Company investigates all complaints of harassment and attempts to maintain confidentiality of complaints of harassment and the investigation of such complaints to the extent that this is reasonably possible. If you believe a report must be made anonymously, please call the Company's toll-free, 24-hour Helpline or visit the website to report your concerns. You will be given a case number and the appropriate Company representative will promptly investigate your report. If the investigation confirms that a violation of this policy has occurred, then appropriate corrective actions, including disciplinary measures commensurate with the severity of the offense (up to and including termination), will be taken regardless of whether the policy violation also constitutes a violation of applicable law. At the conclusion of the Company's investigation, the Company will communicate the outcome of the investigation to the employee who originated the complaint as appropriate.

Prohibition on Retaliation

The Company will not take adverse action against an employee because he or she, in good faith, complained of harassment, participated in an investigation of such a complaint, or otherwise attempted to protect or enforce his or her rights under applicable federal, state and/or local discrimination laws. Any employee who believes he or she has been retaliated against for making such complaint or participating in an investigation must immediately report the matter in the same manner as outlined above. Although retaliation against an employee who, in good faith, makes a complaint of harassment is prohibited, false accusations also have consequences. Any employee that makes a false accusation without a good faith reasonable belief in the truth of the allegation is subject to discipline.

Interpretation

Any questions of interpretation of this policy are to be referred to the Company's Human Resources or Legal Department.

Versions

This policy may be updated from time to time. All current versions of WNA policies will be posted on Wieland One.