

Power Transmission Distributors Association Offensive Behavior Policy

Adopted December 2001

PTDA is committed to providing a work environment that is free from discrimination, harassment and from offensive or degrading remarks and conduct, including workplace violence. Employees and members are expected to conduct themselves in a manner consistent with the spirit and intent of this policy.

Discrimination

PTDA provides equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, sex, marital status, national origin, age, disability, or status as a Vietnam-era or special disabled veteran, or to any other prohibited bases in accordance with applicable laws. This policy applies to all terms and conditions of employment including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

Harassment

Harassment may include verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of the individual's race, creed, religion, color, age, sex, national origin or ancestry, sexual/affection orientation, marital status, disability, veteran status, or status with regard to public assistance. Harassment may include but is not limited to:

- Epithets
- Slurs
- Negative stereotyping
- Threats
- Intimidation
- Hostile acts
- Denigrating or hostile written or graphic materials posted or circulated in the workplace

Sexual Harassment

Sexual harassment may include unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature where:

- Submission to the conduct is or is threatened to be a condition of employment;
- Submission to or rejection of such conduct is used or is threatened to be used as the basis for employment decisions.
- The conduct has the purpose or effect of unreasonably interfering with an individual's work performance; or
- The conduct has the purpose or effect of creating an intimidating, hostile or offensive environment in the workplace or at association functions.

A few examples of sexual harassment or actions that have the potential for creating a hostile or offensive environment in the workplace and at association functions include, but are not limited to:

- Any indication, expressed or implied, that an employee's job security, job assignment, conditions of employment, or opportunities for advancement depend or may depend on the granting of sexual favors to any other employee, supervisor, manager, member, officer, director or vendor.
- Any action relating to an employee's job status which is, in fact, affected by consideration of the granting or refusal of social or sexual favors.
- Use of any offensive or demeaning terms which have sexual connotation.
- Deliberate or careless dissemination of materials (such as cartoons, articles, pictures, etc.) which have a sexual content, which are not necessary for our work, and which employees or members may find offensive.
- Deliberate or careless expression of jokes or remarks of a sexual nature to or in the presence of employees or members who may find such jokes or remarks offensive.
- Objectionable physical proximity or physical conduct.
- Unwelcome suggestions regarding or invitations to social engagements or work-related social events.

Workplace Violence

PTDA is committed to providing a safe work environment. Employees or members who engage in behavior that threatens the safety of employees or members of PTDA will be subject to immediate disciplinary action, up to and including termination. Such threatening behavior includes, but is not limited to, any action, word or object that is intended to harm or intimidate, or has the effect of harming or intimidating another person. No form of weapon (e.g. knives, guns, explosives or toxic substances) will be tolerated on PTDA premises or at association functions. Employees or members who bring weapons to PTDA premises or functions, who infer they have such weapons on PTDA premises or at functions, or who make statements which appear to threaten the safety of others will be subject to disciplinary action, up to and including termination.

Complaint Resolution Procedure

Each member of PTDA management is responsible for creating an atmosphere free of discrimination, harassment, or otherwise offensive behavior. Further, employees and members are responsible for respecting the rights of their co-workers and fellow members.

Any employee who believes she or he has been subjected to any job-related discrimination, harassment or other offensive behavior should prepare a written report of the incident and present the report to the employee's supervisor, who shall in turn present the report to the Executive Vice President. If the supervisor is the party alleged to have committed the offensive conduct, or is otherwise believed by the employee to have been involved in the activity, the employee should present the report directly to the Executive Vice President. Any member who believes she or he has been subjected to offensive conduct should prepare a written report of the incident and present the report to the Executive Vice President. Complaints of offensive conduct will be investigated in a discrete and confidential manner, and PTDA shall take appropriate corrective or disciplinary action where warranted.

Unless more immediate action is necessary, upon receipt of a report alleging offensive conduct, the Executive Vice President, with advice of legal counsel, shall appoint an individual or committee of three, in the Executive Vice President's discretion, to promptly conduct a full, fair and, to the extent possible, confidential investigation of the allegation. Where necessary and appropriate, the investigation shall include confrontation of the employee(s) or member(s) alleged to have committed the offensive acts, in which case those accused shall have an opportunity to respond, in writing or in person, to the allegations.

The results of the investigation shall be communicated in writing to the complaining employee or member and to the employee(s) or member(s) accused. If the results of the investigation are that the accused employee(s) or member(s) did engage in offensive conduct, the employee(s) or member(s) will be subject to disciplinary action including, where appropriate, termination of employment or membership by PTDA. A copy of the investigation report and its conclusions will be permanently maintained by PTDA, and, where discipline has been imposed on an employee(s), a copy of the report and its conclusions will also be placed in the personnel file of those employees.

PTDA prohibits any form of retaliation against any employee or member for filing a bona fide complaint under this policy or for assisting in a complaint investigation. However, if, after investigating any complaint of offensive conduct, PTDA determines that the complaint is not bona fide or that an employee or member has provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the complaint or who gave the false information.

PTDA prohibits offensive behavior in the workplace and at association functions. All PTDA employees and members are responsible for contributing to a work environment that is free of offensive behavior in any form, including violence, discrimination, and verbal, physical, and visual harassment.