

# Anti-Discrimination and Anti-Harassment Policy

## Anti-Discrimination Policy

ClarineT is an "equal opportunity employer." ClarineT will not discriminate and will take "affirmative action" measures to ensure against discrimination in employment, recruitment, advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment against any employee or job applicant on the bases of race, creed, color, national origin, or sex.

## Anti-Harassment Policy

ClarineT is committed in all areas to providing a work environment that is free from harassment. Harassment based upon an individual's sex, race, ethnicity, national origin, age, religion or any other legally protected characteristics will not be tolerated. The policy is applicable to all Company's personnel and to those of contractors, suppliers or clients while at the workspace.

In general, harassment means persistent and unwelcome conduct or actions on any of the bases underlined above. Sexual harassment is one type of harassment and includes unwelcome sexual advances, unwelcome physical contact of a sexual nature or unwelcome verbal or physical conduct of a sexual nature.

Unwelcome verbal or physical conduct of a sexual nature includes, but is not limited to:

- ☐ The repeated making of unsolicited, inappropriate gestures or comments;
- ☐ The display of offensive sexually graphic materials not necessary for our work;

Harassment on any basis (race, sex, age, disability, etc.) exists whenever

- ☐ Submission to harassing conduct is made, either explicitly or implicitly, a term or condition of an individual's employment.
- ☐ Submission to or rejection of such conduct is used as the basis for an employment decision affecting an individual.
- ☐ The conduct interferes with an employee's work or creates an intimidating, hostile or offensive work environment.

All employees, including supervisors and other management personnel, are expected and required to abide by this policy. No person will be adversely affected in employment with the employer as a result of bringing complaints of unlawful harassment.

If an employee feels that he or she has been harassed on the basis of his or her sex, race, national origin, ethnic background, or any other legally protected characteristic they should immediately report the matter to his or her supervisor. If that person is not available, or if the employee feels it would be unproductive to inform that person, the employee should immediately contact that supervisor's superior or human resources. Once the matter has been reported it will be promptly investigated and any necessary corrective action will be taken where appropriate. All complaints of unlawful harassment will be handled in as discreet and confidential a manner as is possible under the circumstances. The procedure for reporting incidents of harassing behaviour is not intended to impair, replace, or limit the right of any employee to seek a remedy under available jurisdiction law by immediately reporting the matter to the appropriate agency.

Any employee engaging in improper harassing behaviour will be subject to disciplinary action, including the possible termination of employment.

**Marco Ramognino**

CEO

ClarineT srl

**February 2013**

