



Anti-Discrimination/Anti-Harassment Policy

GTel strives to maintain a workplace environment free from harassment and discrimination, and to communicate steps available for employees to utilize when they believe they have been subjected to inappropriate treatment under the company's policy. Every person in the GTel must be treated with fairness, respect, and dignity.

GTel prohibits discrimination, including sexual and other forms of harassment, of any employee by anyone in the workplace (including supervisors, co-workers, board members, consultants, interns, volunteers, vendors and other non-employees) for any illegal discriminatory reason, including race, color, sex, national origin, ethnicity, military or veteran status, mental or physical disability, marital status, sexual orientation, gender identity, transgender status, genetic information/predisposition or carrier status, age, religion, creed, domestic violence victim status, and any other classification protected by federal, state or local law. Such discrimination, including harassment, is prohibited by law and by GTel policy. The behavior of individuals engaging in such conduct or supervisors, who knowingly allow such behavior to continue, will not be tolerated.

ALL GTEL PERSONNEL, WHETHER MANAGEMENT OR NON-MANAGEMENT, ARE PROHIBITED FROM ENGAGING IN THE CONDUCT PROHIBITED BY THIS POLICY.

1. Definition of Unlawful Harassment

GTel prohibits all forms of unlawful discrimination. Unlawful harassment is a form of unlawful discrimination.

GTel prohibits sexual and other forms of harassment based on any classification protected by federal, state or local law. Unlawful harassment includes unwelcome or inappropriate verbal, physical or other communication or conduct that denigrates or shows hostility or aversion to a person and/or group and:

- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the complaining individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

Depending upon circumstances, unlawful harassment may include (but is not limited to): jokes, epithets, slurs, negative stereotyping, threatening, intimidating or hostile acts, unwelcome personal comments or written or graphic material including e-mail that denigrates or shows hostility or aversion toward an individual or group on the basis of race,



color, sex, national origin, ethnicity, military or veteran status, mental or physical disability, marital status, sexual orientation, gender identity, transgender status, genetic information/predisposition or carrier status, age, religion, creed, domestic violence victim status, and any other classification protected by federal, state or local law.

2. Definition of Sexual Harassment

Sexual harassment is among the types of discrimination and harassment that is prohibited by GTel. **SEXUAL HARASSMENT WILL NOT BE TOLERATED.** Sexual harassment is a form of sex discrimination and is unlawful under federal, state and local law. Sexual harassment includes harassing or discriminating conduct directed against an individual on the basis of sex, sexual orientation, gender identity and the status of being transgender. Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex. Sexual harassment can occur when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment.

Depending upon the facts of the particular situation, unwelcome conduct that may constitute sexual harassment includes, but is not limited to the following, when such conduct occurs in the workplace or between employees away from the workplace:

- Physical assaults of a sexual nature, such as:
 - Touching, pinching, patting, grabbing, brushing against another employee's body or poke another employees' body;
 - Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
 - Requests for sexual favors accompanied by implied or overt threats concerning the victim's job performance evaluation, a promotion or other job benefits or detriments;
 - Subtle or obvious pressure for unwelcome sexual activities.
- Sexually oriented gestures, noises, remarks, jokes or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
 - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or mobile devices and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:



- Interfering with, destroying or damaging a person's workstation, tools, or equipment, or otherwise interfering with the individual's ability to perform the job;
- Sabotaging an individual's work;
- Bullying, yelling, name-calling.

Sexual harassment is considered a form of employee misconduct and sanctions will be enforced against individuals engaging in sexual harassment and against supervisory and managerial personnel who knowingly allow such behavior to continue.

3. Definition of Other Types of Harassment

Harassment on the basis of race, color, gender, national origin, disability, sexual orientation, age, religion, protected activity or any other protected category is defined as verbal, physical, or other communication or conduct that denigrates or shows hostility or aversion and:

- Has the purpose or effect of creating an intimidating, hostile, or offensive work environment; or
- Has the purpose or effect of unreasonably interfering with the individual's work performance; or
- Otherwise adversely affects an individual's employment opportunities.

In following a policy of fair treatment for all, GTel will take disciplinary action up to and including termination against any person harassing, discriminating or otherwise acting inappropriately during or in relation to employment.

An employee who believes that they have been subjected to workplace harassment or discrimination by anyone is encouraged - but not required - to promptly tell the person that the conduct is unwelcome and ask the person to stop the conduct. A person who receives such a request to stop sexual or other forms of harassment must immediately comply with it and must not retaliate against the employee for rejecting the conduct.