

# **ANTI-HARASSMENT & DISCRIMINATION POLICY**

## I. EQUAL EMPLOYMENT OPPORTUNITY

The employment policy of the Company is to provide equal employment opportunity to all people in all aspects of employer-employee relations without discrimination because of race, color, religion, sex, age, national origin, ancestry, marital status, sexual orientation, disability and veteran status, or any other classification protected by applicable law, except where such considerations are bona fide occupational qualifications permitted by law. The Company will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to training.

Employees with questions or concerns about any type of alleged discrimination in the workplace are encouraged to bring these issues to the attention of <u>Paul Bizon</u>, <u>Vice-President</u>, at (856) 433-6000 and employees can raise such concerns without fear of retaliation. Anyone found to be engaging in any type of unlawful discrimination and/or retaliation will be subject to disciplinary action, up to and including termination of employment.

### II. WORKPLACE HARASSMENT

#### Introduction

It is the policy of the Company to prohibit harassment in the workplace based on sex, race, national origin, religion, age, color, sexual orientation, physical or mental disability, veteran status, and other classifications protected by applicable law.

The Company will investigate and eradicate any form of illegal harassment, investigate complaints about conduct in violation of this Policy, and implement remedies to ensure employees are protected from illegal harassment.

Employees at all times should treat other employees respectfully and with dignity in a manner so as not to offend the sensibilities of a co-worker. Accordingly, the Company management is committed to vigorously enforcing this Policy at all levels within the Company.

### What is Sex-Based Harassment?

Unwelcome sexual advances, requests for sexual favors and other verbal, physical or visual conduct of a sexual nature constitute sexual harassment when:

- submission to such conduct is made a condition of employment; or
- submission or rejection of such conduct is used as a basis for employment decisions affecting the individual; or

• such conduct has the purpose or effect of substantially interfering with work performance, or creating or maintaining an intimidating, hostile or offensive environment.

Sexual harassment may include a wide range of obvious and/or subtle comments and conduct. Depending on the circumstances, it may include, but is not limited to, repeated offensive or unwelcome sexual advances; subtle or overt pressure for sexual favors; sexual jokes; verbal comments or innuendo of a sexual nature; propositions or advances; graphic commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling, touching, pinching or other physical touching; suggestive, insulting or obscene comments or gestures; and display of sexually suggestive objects or pictures.

Sexual harassment may include harassment between individuals of the same gender.

## What is Harassment Based on Other Protected Classifications?

Harassment based on race, national origin, religion, age, color, physical or mental disability, veteran status, and other legally protected classifications exists in instances such as:

• Negative statements, jokes, insults, offensive pictures or drawings and/or other actions directed to an employee because of his or her race, national origin, religion, age, color, physical or mental disability, veteran status, or other legally protected classifications.

### **Whose Conduct is Covered?**

This policy applies to all employees and to conduct engaged in by fellow employees, supervisors, trustees and outside vendors, suppliers, customers, visitors and others not directly connected to the Company. This policy prohibits employees, supervisors, outside vendors, suppliers, customers, visitors and others not directly connected with the Company from harassing Company employees in violation of this policy. Conversely, the Company expects its employees to treat non-employees, such as customers, with courtesy and respect and free from harassment. Harassment of non-employees by Company employees is strictly prohibited.

### **Reporting Prohibited Harassment.**

The Company encourages the prompt reporting of all perceived incidents of harassment, regardless of who the alleged offender may be.

If you are a witness to or become aware of prohibited harassment, or believe that you have experienced harassment based on your race, color, religion, sex, age, national origin, ancestry, marital status, sexual orientation, disability or veteran status, or any other classification protected by applicable law, then you should immediately notify <u>Paul Bizon, Vice-President, at (856) 433-6000</u>. If for any reason you are uncomfortable speaking with Mr. Bizon, then you should report the incident to either <u>Linda Cloude at (410) 633-0300</u> or <u>Denise Fearon at (856) 433-6000</u>.

#### **Investigations of Harassment Complaints.**

Reports of harassment will be investigated promptly and thoroughly by a person who is not involved in the alleged harassment. To the extent practical and appropriate under the circumstances, confidentiality will be maintained throughout the entire investigation to protect the privacy of the individuals involved.

The complaining individual will be informed of the results of the Company's investigation.

### **Corrective Action.**

If the Company's investigation confirms that harassment or other improper behavior has occurred, the Company will take appropriate action. Such action may include, for example, training, referral to counseling, or disciplinary action, such as warnings, reprimands, reassignment, suspension, or discharge.

### No Retaliation.

An employee will not be subject to retaliation, intimidation, or discipline as a result of making a good faith complaint of harassment or providing information in connection with another's complaint.

### Cooperation.

An effective workplace harassment policy requires the support and example of Company personnel in positions of authority. Company managers, supervisors, or staff members who engage in sexual or other harassment or retaliation, or who fail to cooperate with Company sponsored investigations of alleged harassment or retaliation may be severely sanctioned by actions including suspension or dismissal. Similarly, staff members, supervisors, and managers who refuse to implement remedial measures, obstruct the remedial efforts of other staff members, and/or retaliate against complaining individuals or witnesses, may immediately be sanctioned by actions including suspension or termination.

### III. <u>ANTI-RETALIATION</u>

The Company prohibits discrimination, harassment and/or retaliation against any employee who provides information or otherwise assists in an investigation or proceeding regarding any conduct which he or she reasonably believes to be in violation of this Policy or applicable law. If an employee provides such information or assistance, the Company will not discharge, demote, suspend, threaten, harass or otherwise discriminate or retaliate against him or her in the terms or conditions of employment because of that activity. No officer, employee, agent, contractor or subcontractor of the Company has the authority to engage in any conduct prohibited by this paragraph.

Any employee who has any questions concerning any aspect of this policy may contact Paul Bizon, Vice-President, at (856) 433-6000 for guidance.



# ANTI-HARASSMENT AND DISCRIMINATION POLICY ACKNOWLEDGMENT FORM

I acknowledge that I have received a copy of, and have read and understand, the Company's Anti-Harassment and Discrimination Policy.
Signature
Please Print or Type Name of Employee
Date

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