

GATEWAY PROGRAM DEVELOPMENT CORPORATION EQUAL EMPLOYMENT OPPORTUNITY POLICY PROHIBITING DISCRIMINATION AND HARASSMENT

I. Introduction

This document sets forth the official policy of Gateway Program Development Corporation (GDC) affirming GDC's commitment to equal opportunity for all employees and applicants for employment and prohibitions against discrimination and harassment based on membership in enumerated protected classes as well as the prohibitions against retaliation based upon the exercise of rights pursuant to this policy.

II. Policy

It is the policy of GDC to promote fair and equitable treatment of all employees and applicants for employment and to comply with all applicable laws and regulations governing equal employment opportunity. GDC is committed to providing equal opportunity in all employment matters, including but not limited to recruitment, hiring, upgrading, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay or other forms of compensation, use of facilities, and treatment of employees. GDC is also committed to establishing a working environment for all employees and applicants for employment that is free from discrimination and harassment. GDC strictly prohibits discrimination and harassment based on actual or perceived race, religion, color, national origin, ancestry, age, sex, sexual orientation, pregnancy, gender identity and expression, disability, genetic information, atypical hereditary cellular or blood trait, marital status, civil union status, domestic partnership status, military service, veteran status and any other category protected by law. Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination by any employee, including supervisors and co-workers.

III. Complaint Procedure

Any employee who believes that he or she has been harassed, discriminated against or subject to retaliation by a co-worker, supervisor, agent, client, vendor, consultant or customer of GDC, in violation of the foregoing policies, or who is aware of such harassment, discrimination or retaliation against others, should immediately report it to the office of the General Counsel of GDC or any other office specified for such purposes by the office of the General Counsel from time to time. If managers and supervisors receive reports of discrimination or harassment, they are required to report them immediately to the General Counsel's office.

IV. Investigation

When an employee makes a report of discrimination or harassment, GDC will undertake a prompt investigation as may be appropriate under the circumstances. The steps to be taken during the investigation cannot be fixed in advance, but will vary depending on the nature of the allegation. GDC will maintain confidentiality throughout the investigative process to the extent practical, permitted by law and consistent with GDC's need to undertake a full investigation.

If a complaint of prohibited discrimination or harassment is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken. If a complaint cannot be substantiated, GDC may take appropriate action to reinforce its commitment to providing a work environment free from discrimination and harassment.

V. Management Responsibility

All executives, supervisors and managers are responsible for:

- Implementing this policy, which includes, but is not limited to, taking steps to prevent harassment and retaliation;
- Ensuring that all employees and consultants under their supervision have knowledge of and understand this policy;
- Promptly reporting any complaints to the office of the General Counsel so they may be investigated and resolved in timely manner;
- Taking and/or assisting in prompt and appropriate corrective action when necessary to ensure compliance with this policy; and
- Conducting themselves, at all times, in a manner consistent with this policy.

Failure to meet these responsibilities may lead to disciplinary action, up to and including termination.

Executives, supervisors and managers at all levels are also responsible for ensuring the effectiveness of this policy throughout GDC. Thus, executives, managers and supervisors are notified that their performance in implementing this policy will be formally measured, in the same manner through the performance appraisal process, as their performance of other GDC business objectives. Executives, managers and supervisors at all levels need to understand both the purpose and application of this policy in order to enforce the policy objectives and to work with the General Counsel to maintain an environment free from discrimination and harassment. The success of this Equal Employment Opportunity Policy Prohibiting Discrimination and Harassment will benefit GDC through fuller utilization and development of women, minorities and individuals with disabilities.

VI. Non-Retaliation

GDC prohibits retaliation against individuals who, in good faith, assert their rights to bring a complaint of discrimination or harassment pursuant to this Policy, participate in a discrimination or harassment investigation, or who file, testify, assist or participate in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Retaliation is an offense separate from the original complaint of discrimination, and will be considered independently from the merits of the underlying complaint. Individuals who believe they have been subjected to retaliation should report the conduct to the General Counsel's office. The report and investigation of allegations will follow the procedures set forth in this policy. Any employee found to have retaliated against an individual for reporting discrimination or

harassment or for participating in an investigation of allegations of such conduct will be subject to appropriate disciplinary action.

VII. False Accusations

Knowingly making a material misstatement of fact may subject the complainant to discipline. Anyone who believes that he or she has been the subject of a false complaint may meet with a delegate of the General Counsel to discuss the allegations. The filing of a complaint that does not result in a finding of prohibited conduct is not alone evidence of the intent to file a false complaint.

VIII. General

A copy of this policy statement is to be posted for viewing on GDC's website and facility bulletin boards.

Adopted: September 28, 2018