



ANTI-DISCRIMINATION & ANTI-HARASSMENT POLICY

LAST REVISION 04/02/2018

POLICY BRIEF & PURPOSE

Powell Electronics, Inc. is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, we expect that all relationships among persons working for the Company, in or outside the office, will be business-like and free of bias, prejudice and harassment.

Powell Electronics has developed this policy to ensure that all its employees can work in an environment free from unlawful harassment, discrimination and retaliation. The Company will make every reasonable effort to ensure that all concerned are familiar with these policies and are aware that any complaint in violation of such policies will be investigated and resolved appropriately.

In accordance with applicable law, Powell Electronics, Inc. prohibits sexual harassment and harassment because of race, color, national origin, ancestry, religion, physical or mental disability, veteran status, familial status, age, gender, sexual orientation or any other bias protected by federal, state or local law. Any such harassment may violate the law and will not be tolerated.

SEXUAL HARASSMENT DEFINED

Applicable state and federal law defines sexual harassment as unwanted sexual advances, requests for sexual favors, or visual, verbal, or physical conduct of a sexual nature when: (1) submission to the conduct is made as a term or condition of employment; or (2) submission to or rejection of the conduct is used as basis for employment decisions affecting the individual; or (3) the conduct has the purpose or effect of unreasonably interfering with the Associate's work performance or creating an intimidating, hostile, or offensive working environment. This definition includes many forms of offensive behavior.



The following is a partial list of prohibited behaviors that could be considered sexual harassment in this policy:

- Unwanted sexual advances;
- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct such as leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, or posters;
- Verbal conduct such as making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about any Associate's body or dress
- Verbal sexual advances or propositions;
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, or suggestive or obscene letters, notes, or invitations;
- Physical conduct such as touching, assault, or impeding or blocking movements; and
- Retaliation for reporting harassment or threatening to report harassment.

It is unlawful for males to sexually harass females or other males, and for females to sexually harass males or other females. Sexual harassment on the job is unlawful whether it involves coworker harassment, harassment by a Manager, or harassment by persons doing business with or for the Company.

OTHER TYPES OF HARASSMENT COVERED

Prohibited harassment on the basis of race, color, national origin, ancestry, religion, physical or mental disability, veteran status, familial status, age, gender, sexual orientation or any other protected basis, includes behavior similar to sexual harassment, such as:

- Verbal conduct such as threats, epithets, derogatory comments, or slurs;
- Visual conduct such as derogatory posters, photographs, cartoons, drawings, or gestures;
- Physical conduct such as assault, unwanted touching, or blocking normal movement;
- Retaliation for reporting harassment or threatening to report harassment.



POWELL ELECTRONICS, INC.'S COMPLAINT PROCEDURE

Powell Electronics, Inc.'s Complaint Procedure provides for an immediate, thorough, and objective investigation of any claim of unlawful or prohibited harassment, appropriate disciplinary action against one found to have engaged in prohibited harassment, and appropriate remedies for any victim of harassment. A claim of harassment may exist even if the Associate has not lost a job or some economic benefit.

If you believe you have been harassed on the job, or if you are aware of the harassment of others, you should provide a written or verbal complaint to your Manager or to any other Managers with the Company or to the Manager of Human Resources as soon as possible. Your complaint should be as detailed as possible, including the names of individuals involved, the names of any witnesses, direction quotations when language is relevant, and any documentary evidence (notes, pictures, cartoons, etc.)

Applicable law also prohibits retaliation against any Associate by another Associate or by the Company for using this complaint procedure or for filing, testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing conducted by a government enforcement agency. Additionally, the Company will not knowingly permit any retaliation against any Associate who complains of prohibited harassment or who participates in an investigation.

All incidents of prohibited harassment that are reported will be investigated. The Company will immediately undertake or direct an effective, thorough and objective investigation of the harassment allegations. The investigation will be completed and a determination regarding the reported harassment will be made and communicated to the Associate who complained and to the accused harasser(s).

If the Company determines that the prohibited harassment has occurred, the Company will take effective remedial action, which commensurate with the circumstances. Appropriate action will also be taken to deter any future harassment. If a complaint of prohibited harassment is substantiated, appropriate disciplinary action, up to and including termination will be taken. Whatever action is taken against the harasser will be communicated to the Associate who has made the complaint.

LIABILITY FOR HARASSMENT

Any Associate of Powell Electronics, Inc. who is found to have engaged in prohibited harassment is subject to disciplinary action, up to and including termination from employment. Any Associate who engages in prohibited harassment, including any Manager or supervisor who knew about the harassment but took no action to stop it, may be held personally liable for monetary damages. Any Manager or supervisor who knew about harassment and took no action to stop it or failed to report the harassment to the Manager of Human Resources may also be subject to disciplinary action up to and including termination. The Company does not consider conduct in violation of this policy to be within



POWELL ELECTRONICS, INC.

200 Commodore Drive
Swedesboro, NJ 08085
Toll Free: (800) 235-7880
Fax: (888) 467-6935
www.powell.com

the course and scope of employment or the direct consequence of the discharge of one's duties. Accordingly, to the extent permitted by law, the Company reserves the right not to provide a defense or pay damages assessed against Associates for conduct in violation of this policy.

ADDITIONAL ENFORCEMENT INFORMATION

In addition to the Company's internal complaint procedure, Associates should also be aware that the federal Equal Employment Opportunity Commission (EEOC) and the appropriate state agency or agencies investigate and pursue complaints of unlawful harassment in employment. Associates who believe that they have been unlawfully harassed may file a complaint with either of these agencies. The EEOC and the Human Relations Commission serve as neutral fact finders and attempt to help the parties voluntarily resolve disputes.

For more information, contact the Company's Manager of Human Resources. You may also contact the nearest office of the EEOC or Human Relations Commission, as listed in the telephone directory.