

Equal Employment Opportunity – Prohibited Discrimination

It is the policy of CDI Corporation and its related companies to provide equal employment opportunities to all employees and applicants without regard to race, color, religion, sex, national origin, age, disability, veteran status or any other characteristic protected by applicable law. As such, discrimination based on any of these characteristics is expressly prohibited.

Anti-Harassment – Prohibited Harassment

It is also the policy of CDI Corporation and its related companies that any form of harassment based on race, color, religion, sex, national origin, age, disability, veteran status or any other characteristic protected by applicable law in its business operations is expressly prohibited.

Prohibited harassment includes verbal, visual or physical conduct that belittles, mocks or shows hostility toward an individual because of a characteristic protected by law (such as race, color, religion, sex, national origin, age, disability, veteran status or any other characteristic recognized by applicable law) or that of his or her relatives, friends, or associates, especially when that misconduct:

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

Some examples of what may constitute prohibited harassment are:

- using epithets, slurs or negative stereotypes;
- threats, intimidation or hostile acts that relate to a protected characteristic;
- purported jokes or pranks;
- placing on walls, bulletin boards or elsewhere on the company's premises, or circulating in the workplace by any medium, oral, written, electronic, or graphic material that belittles, mocks or shows hostility toward a person or group because of protected characteristics.

Even one instance of such conduct, if severe enough, may constitute prohibited harassment.

Prohibited Sexual Harassment

Prohibited sexual harassment includes unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature, whether between members of the opposite sex or members of the same sex, especially when:

- submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; or
- submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual; or

- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Some examples of what may constitute prohibited sexual harassment are:

- threatening or taking adverse employment actions if sexual favors are not granted;
- demands for sexual favors in exchange for preferential treatment;
- unwelcome flirtations, propositions, or advances (including continued requests for dates);
- unwelcome physical contact (including kissing, hugging, putting one's arm around another);
- whistling, leering, improper gestures or offensive remarks, including unwelcome comments about appearance;
- sexual jokes or other inappropriate use of sexually explicit or offensive language (including discussions of one's sexual activities);
- the display in the workplace of sexually suggestive objects or pictures;
- conduct or behavior that is not sexual in nature but which conveys insulting, degrading or sexist attitudes because of a person's sex;
- using any telecommunications or computer system to send, receive, or exhibit unwelcome discriminatory and/or sexual displays, etc.

Even one instance of such conduct, if severe enough, may constitute prohibited sexual harassment.

Reporting Responsibilities

Prohibited discrimination or harassment will simply not be tolerated, whether in the office, at outside work assignments, at company-sponsored social functions or elsewhere. Likewise, the company will not tolerate prohibited discrimination or harassment of a non-employee by a company employee.

All employees at all levels of the company are responsible for helping to assure that prohibited discrimination and harassment do not occur by conducting themselves in accordance with this Policy and by reporting prohibited discrimination or harassment that they observe.

The company strongly encourages prompt reporting of all incidents of alleged discrimination or harassment. If you believe you have been the victim of discrimination or harassment, report the problem immediately to any of the following: your supervisor, the company's Human Resources Department, the company's Legal Department or the Code of Conduct Hotline at 215-636-1116. If you work at a customer location, you can contact the manager of the company office from which you were hired and, if you wish, you may also report your complaint to the customer.

Any company manager, supervisor or employee who knows or suspects that an employee is being subjected to prohibited discrimination or harassment must report the matter immediately to the company's Human Resources Department.

It is possible that the harasser does not realize that the advances or behaviors are offensive. If you feel this is the case and only if you are comfortable doing so, you may tell the offender that the behavior is unwelcome and ask that it stop. If you use this informal procedure and the

unwelcome behavior does not stop, or you are not satisfied with the offender's response, or if you choose not to use this informal procedure, or if you want to report the problem in any event, then you must report your complaint promptly according to the instructions set forth above.

Investigation

When a report is made as outlined above, the company will undertake a prompt investigation as may be appropriate under all of the circumstances. During an investigation, involved individuals are expected to cooperate and provide truthful information. The steps to be taken during the investigation will vary depending upon the nature of the allegations. There may be instances in which an individual reporting harassment seeks only to discuss the matter informally, and does not wish the company to undertake an investigation or to take further steps. Nonetheless, the company is committed to its zero tolerance policy and will investigate and address all reports of prohibited harassment or discrimination.

Individuals found by the company to have violated this Policy will be disciplined, up to and including termination. Managers, supervisors or others who fail to advise the Human Resources Department of an actual or suspected violation of this Policy may also be subject to discipline. Prohibited discrimination or harassment by a non-employee of a company employee will result in action reasonably calculated to stop the discrimination or harassment.

If any applicant or employee feels that an investigation of a discrimination or harassment complaint is not proceeding fast enough or that the results of an investigation are unsatisfactory, he or she may contact the company's Legal Department and speak to one of the company's attorneys (phone number 215-636-1113).

No Retaliation

The company will not retaliate against anyone who makes a good faith complaint about alleged discrimination or harassment and it is a violation of this Policy for any person to so retaliate. Retaliation is considered a very serious violation of this Policy that should be reported immediately. The reporting, investigation and resolution of allegations of retaliation will follow the procedures detailed in this Policy.

Workplace Misconduct

This Policy does not limit the company's authority to correct workplace conduct which the company decides is unprofessional or otherwise unacceptable, regardless of whether that conduct meets the legal definition of discrimination or harassment.