

## **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, pregnancy, national origin, age, disability, veteran status, military status, sexual orientation, gender identity, marital status, family status, genetic information or any other characteristic protected by applicable law. As such, discrimination (including any form of unlawful harassment or retaliation) 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, pregnancy, national origin, age, disability, veteran status, military status, sexual orientation, gender identity, marital status, family status, genetic information 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, genetic information 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;
- otherwise adversely affects an individual's employment opportunities.

Some examples of what may constitute prohibited harassment or otherwise inappropriate conduct 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 or inappropriate conduct.

## **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 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 or otherwise inappropriate conduct 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.

It is important to remember that these prohibitions apply not only to oral and written communications, but also to e-mail, voicemail, Internet communications and searches and other technology-assisted communications. Additionally, the prohibitions on inappropriate behaviors set forth in this Policy apply not only in the workplace itself, but also to all other work-related settings such as meetings at client work sites, as well as business-related gatherings off-site.

## **Reasonable Accommodations**

Upon request, the company makes reasonable accommodations with respect to physical and mental disabilities or handicaps, as well as religious observances, practices or beliefs, of which the company is made aware and which do not impose an undue hardship on the company. If you need an accommodation, please contact your Human Resources representative. If you are not satisfied with the response you receive, please use the reporting procedure below.

## **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.

If you believe you have been the victim of discrimination or harassment or have witnessed discrimination or harassment, report the problem immediately to any of the following:

- your supervisor;
- your Human Resources representative;
- the CDI Legal Department;
- CDI's Chief Compliance Officer;
- the Code of Conduct Hotline at 215-636-1116; or
- the Code of Conduct email box – [CodeofConduct@cdicorp.com](mailto:CodeofConduct@cdicorp.com).

If you work at a client 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 client.

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 a Human Resources representative or to the Legal 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. The existence and nature of your complaint/concern will be disclosed only to the extent necessary to conduct a prompt and thorough investigation or as may be necessary to take appropriate corrective actions. 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, discrimination and/or retaliation.

If any applicant or employee feels that an investigation of a discrimination, harassment and/or retaliation 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 or Chief Compliance Officer.

### **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.

### **Violations**

Anyone who violates this policy will be subject to disciplinary action by the company. This disciplinary action may include termination of the violator's employment. Managers, supervisors or others who fail to advise a Human Resources representative or the Legal Department of an actual or suspected violation of this Policy may also be subject to such disciplinary action. Prohibited discrimination or harassment by a non-employee of a company employee will result in action reasonably calculated to stop the discrimination, harassment and/or otherwise inappropriate conduct.