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METRO ONE LOSS PREVENTION SERVICES GROUP INC.

To: All Associates
From: Human Resources
Re: Harassment Policy and Management Responsibilities
Date: May 14, 2019

Anti-Harassment and Non-Discrimination Policy

Metro One is committed to a work environment in which you are treated with respect and dignity. You have the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Accordingly, we prohibit and will not tolerate discrimination or harassment based on race, color, creed, religion, sex, sexual orientation, gender identification, age, national origin, disability, pre-disposing genetic condition, veteran status, marital status or any other protected characteristic as established by law.

A. Definition of Harassment and Discrimination

1. Sexual Harassment constitutes discrimination and is illegal under federal, state and local law. For the purposes of this policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal and physical conduct of a sexual nature when, for example (a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (c) 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.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Such behavior may include, but is not limited to: unwanted sexual advances; requests for sexual favors; sexual jokes and innuendoes; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering; catcalls; touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail, Internet or computer usage); and other physical, verbal or visual conduct of a sexual nature. Harassment that does not include sexual activity or language may also constitute discrimination if it is directed at employees because of their gender.

2. Harassment based on any other protected characteristic is also strictly prohibited and is defined under this policy, as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of your race, color, creed, religion, sex, sexual orientation, gender identification, age, national origin, disability, pre-disposing genetic condition, veteran status, marital status or any other protected characteristic as established by law, and that (a) has the purpose or effect of unreasonably interfering with your work performance; (b) has the purpose or effect of creating an intimidating, hostile or offensive working environment; or (c) otherwise adversely affects your employment opportunities. Harassing conduct includes, but is not limited to: epithets, slurs, negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display or circulation of written or graphic material

that denigrates or shows hostility or aversion toward an individual or group (including through e-mail, Internet or computer usage).

3. Discrimination is also strictly prohibited. Discrimination means that you are subjected to differential treatment based on any characteristic protected by law. This would include less favorable treatment in any terms or conditions of employment (such as promotion, compensation or disciplinary action) based on characteristics such as race, gender, religion, national origin, age, disability, marital status, pregnancy and/or sexual orientation.

B. Retaliation Prohibited

Metro One prohibits retaliation against you in the event you report discrimination or harassment or participate in an investigation of such reports. Retaliation against anyone for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and will be subject to disciplinary action.

C. Individuals and Conduct Covered

These policies apply to all applicants and employees. The policies prohibit harassment, discrimination and retaliation whether engaged in by fellow employees, supervisors, managers or by someone not directly associated with Metro One (e.g., outside vendors, managers, contractors, consultants, clients, or customers).

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

These policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions in order to avoid allegations of harassment.

D. Reporting an Incident of Discrimination, Harassment or Retaliation

Metro One requires the reporting of all incidents of actual or perceived discrimination, harassment or retaliation, regardless of the offender's identity or position. If you believe you have experienced conduct that you believe is contrary to our policy or have concerns about such matters you should file a complaint with one of the following: (1) a Manager or the Director of Human Resources; (2) Your supervisor; or (3) a member of senior management in your department. You should not feel obligated to file your complaints with your immediate supervisor before bringing the matter to the attention of one of the other Metro One designated representatives identified above.

IMPORTANT NOTICE TO ALL EMPLOYEES: If you have experienced conduct you believe is contrary to this policy you have an OBLIGATION to follow this complaint procedure. Failure to do so may limit your legal rights.

Early reporting and intervention are the most effective tools in resolving actual or perceived incidents of discrimination, harassment or retaliation. Therefore, Metro One strongly urges the prompt reporting of complaints or concerns so that prompt and appropriate corrective action can be taken.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to offending conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

E. Investigation

Any reported allegations of discrimination, harassment or retaliation will be promptly investigated. As deemed appropriate by the Company, the investigation may include individual interviews with the parties involved and with individuals who may have observed the alleged conduct or may have other relevant knowledge. Confidentiality will be maintained throughout the investigatory process to the extent it is consistent with performing an adequate investigation and taking appropriate corrective action.

F. Responsive Action

Conduct contrary to this policy will be dealt with appropriately as determined by Metro One under the particular circumstances. Responsive action may include, for example, training, referral to counseling, written or verbal warning, reprimand, withholding of a promotion or pay increase, reassignment, suspension or termination, as Metro One deems appropriate under the circumstances.

G. False and Malicious Accusations

Knowingly making false or malicious complaints of discrimination or harassment, as opposed to complaints, which even if erroneous, are made in good faith, may be the subject of appropriate disciplinary action.