

POLICY NO. GP-4 PROHIBITION AGAINST WORKPLACE HARASSMENT

Donley's prohibits harassment of any type relating to any protected characteristic, such as age (40 and older), race, creed, religion, disability or handicap, sex (including pregnancy), sexual orientation, gender identification, gender transition, genetic information, ancestry, national origin; or veterans' status. Engaging in harassing conduct constitutes a violation of Donley's employment policies and can subject an employee to disciplinary action up to and including termination. Workplace harassment is defined as behavior and comments based on any characteristic considered a protected classification pursuant to local, state and/or federal laws, statutes or ordinances that has the effect of interfering with an individual's work or of creating an offensive work environment.

The HR Department is responsible for the administration of this policy. The contact information is:

HR Department
5430 Warner Road
Cleveland, Ohio 44125
Tel: (216) 524-6800

Believing that prevention is the most appropriate activity in seeking the elimination of workplace harassment, it is our policy to express our rejection of such behavior on an annual basis. Any employee, regardless of position or title, deemed to have subjected an individual to harassment or retaliation in violation of this policy, will be subject to discipline, up to and including termination of employment.

Donley's is committed to enforcing this policy against all forms of harassment and it is our policy to take corrective actions should acts of workplace harassment occur. However, the effectiveness of our efforts depends largely on employees telling us about inappropriate workplace conduct. If employees feel that they or someone else may have been subjected to conduct that violates this policy, they should report it immediately. If employees do not report harassing conduct, Donley's may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action. Any employee can raise a claim of workplace harassment with his/her direct supervisor, the HR Department, the Executive Vice President or the President, at any time. Any such claims shall be kept as confidential as possible, will be investigated, and appropriate actions taken. Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. Donley's will directly and thoroughly investigate the facts and circumstances of all claims of perceived harassment and will take prompt corrective action, if appropriate. Additionally, any manager or supervisor who observes harassing conduct must report the conduct to the HR Department so that an investigation can be made, and corrective action taken, if appropriate. Donley's also provides a reporting hotline for employees to anonymously report harassment. Lighthouse Services, Inc. is an independent provider that assists in identifying improper activity. Reports can be made by calling 855-400-6002 or at: www.lighthouse-services.com/donleyinc. No one will be subject to, and Donley's prohibits, any form of discipline, reprisal, intimidation, or retaliation for good faith reporting of incidents of harassment of any kind, pursuing any harassment claim or cooperating in related investigations.

If you have any questions regarding this policy or questions about harassment that are not addressed in this policy, please contact the HR Department. This policy is not intended to restrict communications or actions protected or required by state or federal law.