



November 1, 2021

To All Employees,

The Laitram Business Philosophy governs the way we do business. As part of our commitment to treat each other with respect, honesty and fairness, we also have formal policies prohibiting workplace harassment, discrimination and retaliation, as well as child and forced labor. Please review these attached policies carefully.

LAITRAM, L.L.C.

A handwritten signature in blue ink, appearing to read "James M. Lapeyre, Jr.", written in a cursive style.

James M. Lapeyre, Jr.
President

LAITRAM, L.L.C.

POLICY PROHIBITING WORKPLACE DISCRIMINATION, HARASSMENT, AND RETALIATION

It is the policy of Laitram, L.L.C. and its subsidiary companies, including, but not limited to, Intralox, L.L.C., Lapeyre Stair, Inc.; Laitram Machine Shop, L.L.C.; Laitram Machinery, Inc.; Industrial Microwave Systems, L.L.C.; and Commercial Food Sanitation, L.L.C. (hereinafter collectively “Laitram”), to provide our applicants and employees with a positive and cooperative work environment, free of discrimination, harassment and retaliation. Discrimination, harassment or retaliation of any kind by anyone, including any supervisor, manager, coworker, vendor, contractor, customer, or other visitor of the Company, directed at an applicant, employee, vendor, contractor, customer, or other visitor of the Company, is improper and will not be tolerated.

Discrimination

Discrimination against any individual in any aspect of his employment, such as hiring, discharge, compensation or any other terms, conditions or privileges of employment, because of the individual’s race, color, gender, sexual orientation, gender identity, age, religion, national origin, citizenship, disability, pregnancy, military or veteran status, or status or classification under applicable federal, state or local law is illegal and will not be tolerated at Laitram.

Sexual Harassment

Sexual harassment is specifically prohibited by this policy. Unwelcome sexual advances, requests for sexual favors, and other physical, verbal or visual conduct based on sex constitute sexual harassment when:

1. Submission to the conduct is an explicit or implicit term or condition of employment,
2. Submission to or rejection of the conduct is used as the basis for an employment decision, or
3. The conduct unreasonably interferes with an employee’s work performance or creates an intimidating, hostile, or offensive working environment.

Examples of sexual harassment in violation of this policy may include, but are not limited to, the following:

- Unwelcome sexual advances - whether they involve physical touching or not;
- Sexual references, jokes, written or oral references to sexual conduct, comments on an individual’s body, comments about an individual’s sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, or cartoons, including via email or internet;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, or suggestive or insulting comments;
- Inquiries into one’s sexual experiences; and
- Discussion of one’s sexual activities.

Other unwelcome conduct directed at an individual because of his or her gender may also be deemed to be sexual harassment.

Although the intent of the person engaging in the conduct may be harmless or even friendly, it is the unwelcomeness of the conduct by the recipient of the conduct, not the intent of the person engaging in the conduct that is relevant to whether the conduct is harassment. Unwelcomeness of sexual conduct may not always be apparent. “Putting up with” or submission to sexual conduct does not necessarily mean the conduct is welcome.

Sexual harassment may occur even in relationships involving mutual consent. The potential for sexual harassment exists where there is a professional power differential (supervisor/employee). Persons involved in such relationships should be aware of the possibility of perceived coercion.

The Company also views any type of romantic or sexual relationship between you and your Supervisor, or anyone in your chain of command, to be a violation of our Business Philosophy. Both parties involved in the relationship would be violating our Business Philosophy with respect to credibility, fairness, and example setting. If a relationship of this type exists, you must immediately contact the Director of Human Resources or Jay Lapeyre. Failure to do so may result in possible disciplinary action, up to and including termination.

Harassment Based on Other Protected Categories

Harassment based on the race, color, age, religion, gender, national origin, sexual orientation, gender identity, citizenship, disability, or military/veteran status of an applicant or employee is also prohibited at Laitram. As with sexual harassment, harassment based on any of these categories may include physical, verbal or nonverbal conduct.

Examples of actions that may constitute harassment in violation of this policy include racial or ethnic epithets, slurs, jokes or negative stereotyping. Taunting or displaying written materials or communications demonstrating hostility toward a person because of his race, color, age, religion, national origin, sexual orientation, gender identity, citizenship, disability, or veteran status are other examples of prohibited conduct.

While all unwelcome conduct of a discriminatory nature may not rise to the level of constituting illegal harassment, this policy seeks to prevent all such conduct. For example, while one racial joke may not constitute illegal racial harassment, it is prohibited. Laitram's policy seeks to prevent all discriminatory conduct against members of the campus community based on race, color, age, religion, national origin, gender identity, sexual orientation, citizenship, disability, or veteran status.

Retaliation

The Company will not condone, authorize, or tolerate any kind of retaliation against any applicant or employee who has:

1. Made a good faith report of conduct that he believes may constitute harassment, discrimination or retaliation in violation of this policy,
2. Opposed any prohibited discriminatory practice, or
3. Participated in any manner in an investigation or other proceeding about a prohibited practice.

Complaints made in good faith will in no way be held against an applicant or employee.

Employment decisions about an applicant or employee who has reported possible harassment, discrimination or retaliation should not be based on the fact that the person has submitted a complaint. Employment decisions should be based only on legitimate business considerations such as performance. Discriminatory verbal, nonverbal or physical conduct should not be directed at any applicant or employee because of any protected activity.

Violations and Sanctions

Employees who violate this policy will be subject to disciplinary action, up to and including termination.

DISCRIMINATION, HARASSMENT AND RETALIATION COMPLAINT PROCEDURE

In order to take appropriate, corrective action, the Company must be advised of harassment, discrimination or retaliation. All Company employees are required to help ensure that we maintain a workplace free of harassment, discrimination, and retaliation.

If, as an employee of Laitram, you are subjected to any type of harassment, discrimination or retaliation, you have an obligation to immediately report that conduct in writing, or verbally if necessary, regardless of whether the conduct involves other employees, customers, vendors, or others in the work environment, to one of the following individuals:

- Your department manager or to one of the following if your department manager is a focus of the complaint
- Your department's LCI Partner
- Jennifer McMillan – Human Resources Director
- Jay Lapeyre

If you do not receive a prompt response to your complaint, please advise Jay Lapeyre in writing immediately.

Additionally, each employee has a duty to report conduct that he or she believes may constitute discrimination, harassment or retaliation. Remember, unless you report instances of discrimination, harassment or retaliation, the Company will not know that management intervention is necessary.

The Company's policy is to investigate all complaints thoroughly and promptly. To the extent practicable, the Company will keep complaints confidential. If an investigation confirms the harassment, discrimination, or retaliation has occurred, the Company will take appropriate corrective action, up to and including termination.

Because of the seriousness with which the Company views sexual harassment, discrimination, and retaliation and because of the severity of the penalties that may be imposed on offenders, false accusations will not be tolerated. However, this statement is not intended to discourage employees from coming forward with a good faith complaint. The Company recognizes and expects that some claims may be difficult to prove or support, or may not in fact be found to rise to the level of seriousness deemed necessary to constitute sexual harassment, discrimination, or retaliation in violation of this policy. However, anyone found to have purposefully and intentionally brought allegations that he or she knows to be untrue will be deemed to have made false accusations and will be subject to immediate disciplinary action, up to and including termination.