



THE CUSTOM GROUP OF COMPANIES

The Custom Group of Companies – Anti-Harassment Policy

Equal Opportunity Employer

Equal employment opportunity has been and continues to be both policy and practice at Custom. Custom complies with all applicable federal, state, and local fair employment practices laws. Custom provides equal employment opportunity to all employees and applicants without regard to an individual's race, color, religion, creed, sex, sexual orientation, gender (including gender identity and expression), age, national origin, immigration status, marital or familial status, citizenship status, ancestry, physical or mental disability, genetic information, veteran or military status or any other characteristic or status protected under applicable federal, state or local law. All employment decisions are based on the individual's qualifications and job-related factors such as ability, work quality, experience, and potential. This policy applies to all terms and conditions of employment, including, but not limited to, hiring, recruiting, selection, training, assignments, placements, referrals, promotion, discipline, compensation, benefits, and termination of employment.

In addition, Custom does not discriminate against any temporary employee or applicant in making assignments, does not invite or honor discriminatory job orders or requests by clients, and does not "code" applications or other documents to record the protected status of any applicant or employee.

Any employee who violates this Policy will be subject to discipline, up to and including the possibility of discharge.

Anti-Harassment Policy

Custom strictly prohibits and does not tolerate unlawful harassment against employees or any other covered persons because of race, color, religion, creed, sex, sexual orientation, gender (including gender identity and expression), age, national origin, immigration status, marital or familial status, citizenship status, ancestry, physical or mental disability, genetic information, veteran or military status or any other characteristic or status protected under applicable federal, state or local law. Harassment is unlawful and a form of employment discrimination governed by federal law, applicable state law, and applicable local laws as well. Harassment is unwelcome or offensive conduct based on a protected characteristic or status (as listed above).

Although all forms of harassment are strictly prohibited, Custom wishes to specifically address the issue of sexual harassment in the workplace. Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual

harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender. All employees of Custom, including supervisory and non-supervisory personnel, and other workers and stakeholders (including vendors, clients, and visitors) are prohibited from harassing employees or other covered persons based on that individual's sex or gender, regardless of the harasser's sex or gender. Sexual harassment includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature when: (a) submission to such conduct is made either explicitly or implicitly a term or condition of employment; (b) submission to or rejection of such conduct is used as a basis for employment decisions; or (c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, or offensive work environment, even if the reporting individual is not the intended target of the conduct.

Custom will not tolerate any form of sexual harassment, regardless of whether it is:

- Verbal (for example, epithets, derogatory statements, slurs, sexually-related or degrading comments or jokes, graphic or suggestive comments about an individual's dress or body, unwelcome sexual advances, or requests for sexual favors);
- Physical (for example, assault, touching, grabbing or inappropriate physical contact); or
- Visual (for example, displaying nude or sexually suggestive posters, pictures, calendars, cartoons, or drawings, sending inappropriate adult-themed gifts, leering, or making sexual gestures).

The conduct prohibited by this policy includes conduct in any form, including, but not limited to e-mail, voice mail, chat rooms, social media interaction or communications, internet use or history, text messages, pictures, images, writings, words, or gestures, and is not limited to the physical workplace – for example, it can occur when traveling for business or at business-related events. This list is illustrative only and not exhaustive. No form of sexual harassment will be tolerated.

Employees engaging in sexual harassment, and supervisory and managerial personnel who knowingly allow such behavior to continue, will face disciplinary action, up to and including termination of employment.

While sexual harassment is unlawful and a form of employee misconduct, this policy against harassment also applies to improper conduct toward Custom's employees by clients, contractors, vendors, and other non-employees. If you inform Custom that you have been subjected to sexual or other harassment in the workplace by a non-employee, that individual or a responsible person will be informed of Custom's anti-harassment policy and appropriate corrective action and preventative steps will be taken. Harassment of non-employees/third-parties (e.g., contractors, subcontractors, vendors, consultants, etc.) on Custom's premises by Custom employees or others will also not be tolerated.

Custom provides annual interactive sexual harassment training for all employees, including supervisory and managerial employees, as required by applicable law. Your participation in such trainings is required.

Complaint Procedure

Custom is committed to enforcing its policy against all forms of harassment and discrimination. However, the effectiveness of our efforts depends largely on employees telling us about inappropriate workplace conduct. If employees feel that they or another employee may have been subjected to harassment, discrimination or retaliation, they should report it immediately. If employees do not report harassing, discriminatory or retaliatory conduct, Custom may not become aware of a possible violation of its policies and may not be able to take appropriate corrective action.

Therefore, if you are subjected to or become aware of any conduct that you believe violates this policy, you must promptly speak to, write, or otherwise contact your direct supervisor or, if the conduct involves your direct supervisor, Diane McGaw (212.818.0300 – diane@customstaffing.com) or Pat Rohe (212.818.0300 — pat@customstaffing.com). However, complaints may also be brought directly to Ms. McGaw or Ms. Rohe if the matter is especially sensitive or personal, or for other similar reasons. If you have not received a satisfactory response after reporting any incident of what you perceive to be harassing, discriminatory or retaliatory conduct, please immediately contact Ms. McGaw or Ms. Rohe. A form for submission of a written complaint is attached to this Policy and can also be obtained from Bookkeeping, and all employees are encouraged to use this complaint form. Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses (among other things).

Any manager or supervisor who is informed of or observes harassing or discriminatory or harassing conduct is required to immediately report the conduct to Ms. McGaw or Ms. Rohe, so that an investigation can be made and corrective action taken, if appropriate. In addition to being subject to discipline if they engage in harassing, discriminatory, or retaliatory conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected harassment, discrimination, or retaliation, or otherwise knowingly allowing such conduct to continue. Supervisors and managers will also be subject to discipline for engaging in any retaliation.

Upon receiving a good faith complaint, Custom will ensure that a prompt investigation is conducted. Custom will thoroughly investigate the facts and circumstances of all claims of perceived harassment, discrimination or retaliation and will take prompt corrective action, as appropriate. Custom understands that complaints can be extremely sensitive and, as far as practicable, will keep such complaints and all communications concerning them confidential.

While the process may vary from case to case, the general procedure for an investigation will be as follows:

- Upon receipt of a complaint, Custom will conduct a prompt review of the allegations, and take any interim actions, as appropriate.

- Custom will take steps to obtain and review key relevant documents, communications, records, etc.
- Interview key parties involved, including relevant witnesses.
- Create a written documentation or report of the investigation.
- Promptly notify the complainant and the accused of the outcome of the investigation and implement any corrective actions.

Any employee may be required to cooperate as needed in an investigation of suspected harassment, discrimination, or retaliation. As discussed in more detail below, retaliation against individuals who complain of harassment or discrimination or who testify or assist in any investigation or proceeding under the law is unlawful and strictly prohibited by the Company. If the Company determines that any employee violates our policy regarding harassment, discrimination, or retaliation, that person will be disciplined accordingly, which may include termination. False and malicious complaints of discrimination, harassment or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of appropriate disciplinary action.

Employees may also choose to pursue legal remedies with governmental entities. The New York State Human Rights Law (HRL) protects employees, interns and non-employees, regardless of immigration status. A complaint alleging violation of the HRL may be filed with the NYS Division of Human Rights (DHR) or in court. The U.S. Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act. An individual can file a charge with the EEOC and may have the right to file a lawsuit in court. Employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Possible remedies available to victims of sexual harassment include action to stop the harassment, damages, attorneys' fees and civil fines.

This is an important topic and we encourage you to discuss any questions you may have concerning any part of this policy with us.

Unlawful Retaliation Prohibited

Custom prohibits all forms of unlawful retaliation, including any form of discipline, reprisal, intimidation, or other form of retaliation, for participating in any activity protected by law. Examples of protected activities include (without limitation):

- Lodging a good faith internal complaint with management specifically opposing unlawful discrimination or harassment (for example, if an employee believes he or she has been sexually harassed).
- Filing a good faith complaint of unlawful discrimination or harassment.
- Participating in Custom's internal investigation into allegations of sexual harassment.
- Requesting a reasonable accommodation arising out of a disability, pregnancy or sincerely held religious belief.

The examples above are illustrative only, and not exhaustive. No form of retaliation for any protected activity will be tolerated. If you believe you are being retaliated against for engaging in protected activity, please immediately notify Ms. McGaw or Ms. Rohe.

Complaint Form on following page.

**THE CUSTOM GROUP OF COMPANIES
COMPLAINT FORM**

Complainant Information

Complainant Name: _____ Title: _____

Work Phone: _____ Email: _____

Work Address: _____

Name of individual subjected to reported behavior (if different than above): _____

Complaint Information

Complaint is made against: _____ Title: _____

Relationship to you: _____

Description of incident(s) including dates, individuals involved, and whether conduct is on-going, and how it has affected your work. Please use additional paper as necessary and attach any relevant documents or evidence, including emails, photos or texts: _____

Identify potential witnesses (names and contact information): _____

Identify documents or communications reflecting or concerning the reported behavior (if not attached):

Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

Signature: _____ Date: _____

You may submit this form itself or use the format of this form and submit via email.