



Equal Opportunity and Anti-Harassment Policy

Globalpundits is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in an environment free of discriminatory practices and behavior, including harassment.

Equal Opportunity

It is the policy of Globalpundits to provide equal employment opportunities, and to administer its personnel practices and maintain an environment free of discrimination or harassment on the basis of race, color, national origin, religion, sex, age, disability, marital status, sexual orientation, and veteran status or any other unlawful criterion or circumstance. Globalpundits prohibits and will not tolerate any such discrimination or harassment.

Definitions of Harassment

Sexual Harassment constitutes discrimination and is illegal under federal, state and local laws. Sexual harassment is defined under the Equal Employment Opportunity Commission Guidelines as verbal, visual or physical conduct of a sexual nature where: (i) there is an attempt, either implicit or explicit, to make submission to such conduct a term or condition of an individual's employment; (ii) submission to or rejection of such conduct by an individual is used as the basis for employment-related decisions; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Harassment on the basis of any other protected characteristic is also strictly prohibited. Such harassment can be defined as conduct that shows hostility or aversion toward an individual because of his or her protected characteristic and that has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Individuals and Conduct Covered

These policies apply to employees, and prohibit harassment, discrimination and retaliation in the workplace or in connection with work, whether engaged in by fellow employees, by a supervisor or manager or by someone else connected with Globalpundits. Conduct prohibited by these policies is unacceptable in the workplace and in any work-related settings outside the workplace, such as during business trips and business-related social events.

Retaliation is Prohibited

Globalpundits prohibits retaliation against any individual who in good faith reports discrimination or harassment or participates in any investigation of such reports. Retaliation against an individual 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, like harassment or discrimination itself, will be subject to responsive action, as discussed further below.

Complaint Procedure

Reporting an Incident of Harassment, Discrimination or Retaliation

Globalpundits strongly urges the reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the identity or position of the perceived offender. Individuals who believe they have experienced, or who are aware of, conduct that they believe is contrary to this policy, or who have any concerns about such matters, should bring these concerns to the attention of the Human Resources Manager. If, for any reason, an individual believes that a complaint cannot or should not be raised through this channel, he or she should feel free to bring it to the attention of the Company's Chief Executive Officer.

Globalpundits strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. Employees who believe that they have experienced harassing or discriminatory conduct have an obligation to pursue this complaint procedure. An employee's failure to fulfill this obligation could affect his or her rights in pursuing legal action.

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

The Investigation

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, 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 consistent with adequate investigation and appropriate corrective action.

Responsive Action

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive actions will entail those actions that Globalpundits believes to be appropriate under the circumstances. This may include, for example, training, referral to counseling and/or disciplinary action, such as a warning or reprimand, withholding of a promotion or pay increase, reassignment, a temporary suspension without pay, or termination.

Anyone who has questions or concerns about this policy should contact the Human Resources Manager.

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