

1-3. POLICY AGAINST DISCRIMINATION

The Company has a policy of zero tolerance regarding any form of unlawful discrimination. The Company is committed to providing a workplace free from unlawful discrimination. It is illegal and against Company policy for any employee to discriminate against another employee, customer, vendor or applicant for a position. Such conduct will result in disciplinary action, up to and including dismissal.

This policy includes discrimination because of race, gender, gender identity, pregnancy, sexual orientation, age, national origin, color, religion, physical or mental disability, genetic information, military status, veteran status, marital status, or any other basis protected by applicable federal, state or local law. It also includes harassment.

This policy covers all aspects of the Company's business, including recruitment, hiring, assignment, conditions of employment, compensation, training, promotion, transfer and termination.

REPORTING DISCRIMINATION

Any employee who feels that he or she has witnessed, or been subject to, any form of discrimination is required to immediately notify their supervisor, Human Resources, or other member of management at the Company.

Every supervisor is responsible for promptly reporting any complaint or suspected act of discrimination to his or her immediate supervisor. Failure of a supervisor to promptly report such complaints or suspected acts is a violation of this policy.

Synechron strictly prohibits retaliation against any employee who provides information about, complains, or assists in the investigation of any complaint of harassment. Adverse action will not be taken against an employee because he or she in good faith reports or participates in the investigation of a violation of this policy. All complaints of discrimination will be promptly, thoroughly and discreetly investigated by appropriate management personnel. The Company requires that every such complaint be received and investigated as a serious matter, and therefore, it is very important for employees to refrain from making such complaints humorously, flippantly or in jest. If the Company determines that an employee inappropriately filed a knowingly baseless complaint, disciplinary action will be taken, up to and including dismissal, at the Company's discretion.

If a determination is made that discrimination did occur, the offending employee will be subject to disciplinary action, up to and including dismissal, at the Company's discretion.

1-4. POLICY AGAINST WORKPLACE HARASSMENT

The Company is committed to providing a workplace free from harassment. Synechron has a strict policy against all types of workplace harassment, including sexual harassment and other forms of workplace harassment based upon an individual's race, gender, gender identity, pregnancy, sexual orientation, age, national origin, color, religion, physical or mental disability, genetic information, military status, veteran status, marital status, or any other status protected by federal, state or local laws. All forms of harassment of, or by, employees, vendors, visitors, customers, and clients are strictly prohibited and will not be tolerated.

A. SEXUAL HARASSMENT

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment (2) submission to, or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual or (3) 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.

While it is not possible to identify each and every act that constitutes or may constitute sexual harassment, the following are some examples of sexual harassment are provided below: (a) unwelcome requests for sexual favors; (b) lewd or derogatory comments or jokes; (c) comments regarding sexual behavior or the body of another employee; (d) sexual innuendo and other vocal activity such as catcalls or whistles; (e) obscene letters, notes, emails, invitations, photographs, cartoons, articles, or other written or pictorial materials of a sexual natures; (f) repeated requests for dates after being informed that interest is unwelcome; (g) retaliating against an employee for refusing a sexual advance or reporting an incident of possible sexual harassment to Synechron or any government agency; (h) offering or providing favors or employment benefits such as promotions, favorable evaluations, favorable assigned duties or shifts, etc., in exchange for sexual favors; and (i) any unwanted physical touching or assaults, or blocking or impeding movements.

B. OTHER HARASSMENT

Other workplace harassment is often verbal or physical conduct that insults or shows hostility or aversion towards an individual because of the individual's race, gender, gender identity, pregnancy, sexual orientation, age, national origin, color, religion, physical or mental disability,

genetic information, military status, veteran status, marital status, or any other status protected by federal, state or local laws.

Again, while it is not possible to list all the circumstances that may constitute other forms of workplace harassment, the following are some examples of conduct that may constitute workplace harassment: (a) the use of disparaging or abusive words or phrases, slurs, negative stereotyping, or threatening, intimidating or hostile acts that relate to the above protected categories; (b) written or graphic material that insults, stereotypes or shows aversion or hostility towards an individual or group because of one of the above protected categories and that is placed on walls, bulletin boards, email, voicemail, or elsewhere on the Company's premises, or circulated in the workplace; and (c) a display of symbols, slogans, or items that are associated with hate or intolerance towards any select group.

C. REPORTING HARASSMENT

Any employee who feels that he or she has witnessed, or been subject to, any form of harassment is required to immediately notify their supervisor, Human Resources, or other member of management at the Company.

Every supervisor is responsible for promptly reporting any complaint or suspected act of harassment to his or her immediate supervisor or Human Resources. Failure of a supervisor to promptly report such complaints or suspected acts is a violation of this policy.

Synechron strictly prohibits retaliation against any employee who provides information about, complains, or assists in the investigation of any complaint of harassment. Adverse action will not be taken against an employee because he or she in good faith reports or participates in the investigation of a violation of this policy. All complaints of harassment will be promptly, thoroughly and discreetly investigated by appropriate management personnel. The Company requires that every such complaint be received and investigated as a serious matter, and therefore, it is very important for employees to refrain from making such complaints humorously, flippantly or in jest. If the Company determines that an employee inappropriately filed a knowingly baseless complaint, disciplinary action will be taken, up to and including dismissal, at the Company's discretion.

If a determination is made that discrimination did occur, the offending employee will be subject to disciplinary action, up to and including dismissal, at the Company's discretion.

**ACKNOWLEDGEMENT OF RECEIPT AND REVIEW OF POLICY AGAINST
DISCRIMINATION AND POLICY AGAINST WORKPLACE HARASSMENT**

By signing below, I acknowledge that I have received and read a copy of the (1-3) Policy Against Discrimination and (1-4) Policy Against Workplace Harassment.

By signing below, I acknowledge that it is my responsibility to have read and understood these policies. These policies can also be found in Synechron's US Employee Handbook.

If I have questions about the content or interpretation of these policies, I will ask my supervisor or Human Resources.

(Employee Name)

(Employee Signature)

(Employee ID Number)

Date: _____