

WORKPLACE HARASSMENT PREVENTION POLICY

Polar Dynamics Robotics, Inc.

Effective Date: January 1, 2024

Policy Number: HR-2024-001

1. PURPOSE AND SCOPE

1. Polar Dynamics Robotics, Inc. ("Company") is committed to providing a work environment free from all forms of harassment, discrimination, and retaliation. This policy applies to all employees, contractors, consultants, temporary workers, and other workers at the Company, including all personnel affiliated with third parties.

2. This policy covers conduct in Company facilities, during work-related travel, at Company-sponsored events, and through electronic communications, including those on Company-provided devices or systems.

2. DEFINITIONS

1. "Harassment" includes any unwelcome verbal, visual, or physical conduct that creates an intimidating, offensive, or hostile working environment based on protected characteristics.

2. "Protected characteristics" include race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, veteran status, or any other characteristic protected by applicable federal, state, or local law.

3. "Sexual harassment" specifically includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical 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 the basis for employment decisions
- c) Such conduct has the purpose or effect of unreasonably interfering with work performance or creating an intimidating, hostile, or offensive working environment

3. PROHIBITED CONDUCT

1. Examples of prohibited conduct include but are not limited to:

- a) Offensive jokes, slurs, epithets, or name-calling
- b) Physical assaults or threats
- c) Intimidation, ridicule, or mockery
- d) Insults or put-downs
- e) Offensive objects or pictures
- f) Interference with work performance
- g) Unwanted sexual advances or propositions
- h) Graphic comments about an individual's body
- i) Display of sexually suggestive objects or pictures
- j) Hostile actions taken against an individual because of their protected characteristic(s)

4. REPORTING PROCEDURES

1. Any employee who believes they have experienced or witnessed harassment should report the incident immediately to:

- a) Their immediate supervisor
- b) Human Resources Department (hr@polardynamics.com)
- c) Ethics Hotline: 1-800-XXX-XXXX
- d) Chief People Officer or Legal Department

2. Reports may be made verbally or in writing and should include:

- a) Date(s) of incident(s)
- b) Description of the conduct
- c) Names of individuals involved
- d) Names of any witnesses
- e) Any supporting documentation

5. INVESTIGATION PROCEDURES

1. The Company will promptly investigate all reports of harassment. Investigations will be:

- a) Conducted with as much confidentiality as possible
- b) Thorough and documented
- c) Completed within 30 days when practicable

- d) Conducted by qualified personnel
2. The investigation process will include:
- a) Interviews with relevant parties
 - b) Review of relevant documents
 - c) Documentation of findings
 - d) Appropriate corrective action where warranted

6. NON-RETALIATION

1. The Company strictly prohibits retaliation against any individual who:
- a) Reports harassment
 - b) Participates in an investigation
 - c) Opposes harassing practices
 - d) Exercises rights under this policy
2. Retaliation will result in disciplinary action, up to and including termination of employment.

7. DISCIPLINARY ACTIONS

1. Violations of this policy will result in disciplinary action, up to and including immediate termination of employment.
2. Factors considered in determining appropriate disciplinary action include:
- a) Severity of the conduct
 - b) Prior incidents
 - c) Position and responsibilities of the offender
 - d) Impact on affected individuals

8. TRAINING AND EDUCATION

1. The Company will provide regular training on harassment prevention to:
- a) All new employees during onboarding
 - b) All employees annually
 - c) Supervisors and managers bi-annually
 - d) Executive leadership team annually

9. POLICY REVIEW AND UPDATES

1. This policy will be reviewed annually by the Legal Department and Human Resources.
2. Updates will be communicated to all employees through official Company channels.

10. ACKNOWLEDGMENT

I acknowledge that I have received, read, and understand this Workplace Harassment Prevention Policy.

Name: _

Title: _

Date: _

Signature: _

This policy supersedes all previous policies and memoranda concerning harassment prevention.