

EQUAL EMPLOYMENT OPPORTUNITY POLICY

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1. PURPOSE AND SCOPE

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1. Polar Dynamics Robotics, Inc. ("Company") is committed to providing equal

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2. This policy applies to all aspects of employment, including but not limited

2. POLICY STATEMENT

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1. The Company expressly prohibits any form of workplace discrimination o

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2. The Company specifically commits to:

a) Recruit, hire, train, and promote persons in all job classifications without regard to protected characteristics;

b) Base employment decisions on valid job requirements and the individual's

merit, qualifications, and abilities;

c) Administer all personnel actions without discrimination, including compensation, benefits, transfers, layoffs, returns from layoff, Company-sponsored training, education, and social/recreational programs; and

d) Provide reasonable accommodations for qualified individuals with disabilities.

3. IMPLEMENTATION AND RESPONSIBILITIES

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1. The Chief Human Resources Officer, under the direction of the CEO, is responsible for:

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2. Management Responsibilities:

a) Ensure all employment decisions within their departments comply with the policy;

b) Monitor the workplace for discriminatory conduct;

c) Take immediate appropriate action to address policy violations;

d) Participate in regular EEO training; and

e) Maintain documentation of employment decisions.

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3. Employee Responsibilities:

a) Comply with this policy in all workplace interactions;

b) Report suspected violations to Human Resources or management;

c) Cooperate in investigations of alleged discrimination; and

d) Complete required EEO training.

4. COMPLAINT PROCEDURE

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1. Any employee who believes they have experienced or witnessed discrimination

a) Their immediate supervisor;

b) Human Resources Department;

c) compliance@polardynamics.com; or

d) Anonymous Ethics Hotline: 1-800-555-0123

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2. Investigation Process:

- a) All complaints will be promptly investigated;
- b) Confidentiality will be maintained to the extent possible;
- c) Relevant documents and witness statements will be collected;
- d) Findings will be documented and appropriate action taken; and
- e) The complainant will be informed of investigation completion.

5. PROHIBITION AGAINST RETALIATION

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1. The Company strictly prohibits retaliation against any individual who:

a) Files a good-faith discrimination complaint;

b) Participates in an investigation;

c) Opposes discriminatory practices; or

d) Exercises rights under applicable EEO laws.

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2. Any employee found to have engaged in retaliation will be subject to discipline.

6. RECORDKEEPING AND COMPLIANCE

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1. The Human Resources Department shall maintain:

a) All employment records for the duration required by law;

- b) Documentation of complaints and investigations;
- c) Training records and policy acknowledgments; and
- d) Required EEO reports and government filings.

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2. The Company will regularly review this policy and related practices to ensure

7. POLICY REVIEW AND UPDATES

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1. This policy will be reviewed annually and updated as necessary to reflect

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2. All updates will be communicated to employees and posted on the Compa

8. ACKNOWLEDGMENT

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1. All employees must acknowledge receipt and review of this policy through

Approved by:

Dr. Elena Frost

Chief Executive Officer

Polar Dynamics Robotics, Inc.

Sarah Nordstrom

Chief Operating Officer

Polar Dynamics Robotics, Inc.

Date: January 1, 2024

