

Employee Conduct, Non-Discrimination, and Anti-Harassment Policy

Northstar Software, Inc.

Effective date: 2025-01-01 | Owner: People Operations | Status: Active

This policy is intended for internal use. It does not create a contract of employment and may be updated at any time.

1. Purpose

Scope: This policy applies to all Northstar Software, Inc. employees (full-time and part-time) and contractors where noted. Local law may impose additional requirements; where local law conflicts with this policy, the stricter standard will apply unless prohibited.

Definitions: “Employee” refers to active staff on the company payroll. “Manager” refers to the employee’s direct manager or other designated approver. “People Operations” (“People Ops”) refers to HR administrators. “Business days” excludes weekends and company holidays.

Northstar is committed to maintaining a respectful, inclusive, and professional workplace. This policy defines standards of conduct and prohibits harassment and discrimination.

2. Standards of Conduct

Employees must act with integrity, respect colleagues, customers, and partners, and comply with all applicable laws and company policies.

Abusive, threatening, or disruptive behavior is prohibited. Employees must avoid conflicts of interest and disclose potential conflicts to their manager and People Ops.

Use of company resources must be appropriate and aligned with business purposes.

3. Anti-Harassment and Non-Discrimination

Harassment, discrimination, and retaliation are strictly prohibited. This includes conduct based on protected characteristics under applicable law.

Harassment may include unwelcome conduct, comments, gestures, or visual materials that create an intimidating, hostile, or offensive environment.

Northstar prohibits sexual harassment including unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.

4. Reporting and Investigation

Employees should report concerns promptly to their manager, People Ops, or another trusted leader. Reports may be made orally or in writing.

Northstar will review reports promptly and conduct a fair investigation. Confidentiality will be maintained to the extent possible.

Retaliation for reporting concerns or participating in investigations is prohibited.

5. Corrective Action

Violations may result in corrective action up to and including termination of employment. Corrective action will be determined based on severity, pattern of behavior, and applicable law.

Northstar may also implement interim measures (e.g., reassignment) to maintain a safe workplace during investigations.

6. Expectations for Managers

Managers are expected to model appropriate behavior, respond promptly to concerns, and escalate issues to People Ops when necessary.

Managers must not attempt to discourage reporting or to independently resolve serious allegations without People Ops involvement.