

ANTI HARASSMENT POLICY

We are committed to providing a work environment free of harassment. As a result, we maintain a strict policy prohibiting sexual harassment and harassment because of race, color, sex, national origin, religion, disability, age genetic information or any other protected category. All such harassment is prohibited. Our anti-harassment policy applies to all persons involved in our operations and prohibits harassment by any employee of S.A.L.E., including supervisors, managers and coworkers.

Sexual Harassment Defined

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to or rejection of such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance *or* creating an intimidating, hostile or offensive working environment.

Sexual harassment includes various forms of offensive behavior. The following is a partial list:

- Unwanted sexual advances.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons or posters.
- Verbal conduct: making or using derogatory comments, epithets, slurs, sexually explicit jokes, comments about an employee's body or dress.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, or suggestive or obscene letters, notes or invitations.
- Physical conduct: touching, assault, impeding or blocking movements.
- Retaliation for making harassment reports or threatening to report harassment.

This policy also protects employees from harassment by volunteers, sponsors, temporary employees, guests, contractors, contestants, or participants associated with S.A.L.E. or S.A.L.E.-sponsored events. If harassment occurs on the job by someone not employed by S.A.L.E., the procedures in this policy should be followed.

This policy applies to males who sexually harass females or other males, and for females who sexually harass males or other females.

Other Types of Harassment

Prohibited harassment on the basis of race, color, national origin, ancestry, religion, physical or mental disability, age, genetic information, the refusal to submit to a genetic test, or other protected category, includes behavior similar to sexual harassment such as:

- Verbal conduct including threats, epithets, derogatory comments or slurs.
- Visual conduct including derogatory posters, photography, cartoons, drawings or gestures.
- Physical conduct including assault, unwanted touching or blocking normal movement.
- Retaliation for making harassment reports or threatening to report harassment.

Complaint Procedure

Any employee who believes that he or she has been harassed or discriminated against by a co-worker, supervisor, volunteer, sponsor, temporary employee, guest, contractor, contestant, or participant associated with S.A.L.E. or S.A.L.E.-sponsored events, or who is aware of the harassment or discrimination of others, should immediately provide a written or verbal report to their supervisor and/or Human Resources Department.

S.A.L.E. will endeavor to protect the privacy and confidentiality of all parties involved to the extent possible, consistent with the need to conduct a thorough investigation.

After a report is received, a thorough and objective investigation by management will be undertaken. The investigation will be completed and a determination made and communicated to you as soon as practical. S.A.L.E. expects that all employees fully cooperate with any investigation conducted by S.A.L.E.

If we determine that this policy has been violated, remedial action will be taken, commensurate with the severity of the offense. Appropriate action will also be taken to deter any future harassment or discrimination. If a complaint of harassment or discrimination is substantiated, appropriate disciplinary action, up to and including discharge, will be taken.

Protection Against Retaliation

Retaliation is prohibited against any person by another employee or by S.A.L.E. for using this complaint procedure, reporting a violation of the equal employment opportunity policy, reporting harassment, or for filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Please report any retaliation to your supervisor. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation is substantiated, appropriate disciplinary action, up to and including discharge, will be taken.

Whistleblower Policy

We recognize that employees will have suggestions for improving the workplace, as well as complaints about the workplace. The most satisfactory solution to a job-related problem or concern is usually reached through a prompt discussion with your supervisor. Please feel free to contact your supervisor with any suggestions and/or complaints. If you do not feel comfortable contacting your supervisor or are not satisfied with your supervisor's response, you are encouraged to speak with someone in management whom you are comfortable approaching. Supervisors are required to report suspected ethics violations to Human Resources, who may investigate reported violations, or refer investigations to S.A.L.E.'s Compliance Officer. For suspected fraud, or when you are not satisfied or uncomfortable with following S.A.L.E.'s open door policy, individuals should contact S.A.L.E.'s Compliance Officer directly.

While we provide you with this opportunity to communicate your views, please understand that not every complaint can be resolved to your satisfaction. Even so, we believe that open communication is essential to a successful work environment and all employees should feel free to raise issues of concern without fear of reprisal.

S.A.L.E.'s Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the Audit Finance Compensation Subcommittee. The Compliance Officer has direct access to this subcommittee of the Executive Committee and is required to report to the Audit Finance Compensation subcommittee at least annually on compliance activity. S.A.L.E.'s Compliance Officer is the President of S.A.L.E.

Accounting and Auditing Matters

The Audit Finance Compensation Subcommittee of the Executive Committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer (President of S.A.L.E.) shall immediately notify the Audit Finance Compensation Subcommittee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.