



Ukpeagvik Inupiat Corporation and its family of companies is committed to maintaining a workplace free of unlawful discrimination.

HARASSMENT POLICY

Employees should be free from harassment on the job, including sexual harassment, whether from co-workers, supervisors, managers, customers or clients. Harassment based upon age, race, gender, sexual orientation, gender identity, religion, marital status, color, creed, national origin, citizenship, military or veteran status, physical or mental disability, or genetic information is prohibited.

Harassment is defined as behavior, whether verbal (e.g. innuendo, epithets, remarks, slurs, jokes, propositions, sounds), physical (e.g. body gestures or contact), or visual (e.g. cartoons, calendars, etc.) that has the purpose or effect of making another person uncomfortable, insulted, afraid, or embarrassed and (1) submission to such conduct is made either explicitly or implicitly a term or condition of employment, or (2) submission to or rejection of such conduct is used as the basis for an employment decision, or (3) such conduct interferes with an employee's ability to perform the job or creates an offensive or hostile work environment.

The Company will not condone or tolerate the harassment of its employees. All employees, regardless of position or title, will be subject to discipline, up to and including termination of employment, should the Company determine that the employee is engaged in the unlawful harassment of another employee. The Company will promptly and thoroughly investigate the facts and circumstances of any claim or allegation of harassment.

The Company strongly encourages employees to report conduct that they believe constitutes harassment. The employee may report harassment directly to his or her supervisor, or to the supervisor's manager or to the Director of Human Resources. It is the responsibility of any employee, supervisor, or manager aware of possible harassment to bring it to the attention of management.

No one will be subject to, and the Company prohibits, any form of discipline or retaliation for reporting incidents of harassment or assisting in an investigation of a harassment complaint. Human Resources, in conjunction with the supervisor, where appropriate, will conduct all investigations in a prompt manner and take corrective action as appropriate.

