

Harassment Prevention Policy

1.0 Scope

This Harassment Prevention Policy (the "**Policy**") applies to all U.S. employees of Curia Global, Inc. and its U.S. subsidiaries (the "Company" or "**Curia**").

2.0 Introduction

Curia is committed to providing a work environment free from all forms of harassment. Consistent with the Company's respect for the rights and dignity of each employee, it is our policy to prohibit all types of harassment of employees or by employees, including, but not limited to, harassment based on actual or perceived race, color, religion, sex, sexual orientation, marital or civil union status, age, national origin, disability, pregnancy, child birth or related medical condition, citizenship, veteran status, genetic information, gender, gender identity or expression, or any other basis prohibited by law. This policy applies prohibits harassment in any form and regardless of whether the behavior in question represents a violation of applicable law.

3.0 Policy

- 3.1** The Company prohibits, and will not tolerate, harassment of an employee by a co-worker, a customer, client, vendor, visitor, member of management or any other person in violation of this Policy or applicable law.
- 3.2** The Company prohibits, and will not tolerate, harassment by an employee of a co-worker, a customer, client, vendor, visitor, member of management or any other person in violation of this Policy or applicable law.
- 3.3** The Company prohibits retaliation against any individual who in good faith complains of perceived harassments or who provides information, or otherwise assists, the Company or a government agency in any investigation of a harassment complaint. **3.4** Any employee of the Company who engages in harassment or retaliation against anyone in violation of this Policy will be subjected to disciplinary action, up to and including termination of employment.

4.0 What is "Harassment"?

Harassment is verbal or physical conduct relating to an individual's actual or perceived race, color, religion, sex, sexual orientation, marital or civil union status, age, national origin, disability, pregnancy, child birth or related medical condition, citizenship, veteran status, genetic information, gender, gender identity or expression, or any other basis prohibited by law when this conduct: (a) has the purpose or effect of creating an intimidating, hostile or offensive working environment; (b) has the purpose or effect of unreasonably interfering with an individual's work performance; or (c) otherwise adversely affects an individual's employment opportunities. Some examples of conduct that may constitute prohibited harassment include: slurs, jokes, cartoons, stereotypes, statements, etc. based upon actual or perceived race, color, religion, sex, sexual orientation, marital or civil union status, age,

national origin, disability, pregnancy, child birth or related medical condition, citizenship, veteran status, genetic information, gender, gender identity or expression, or any other basis prohibited by law.

5.0 What is Sexual Harassment?

5.0.1 Sexual harassment is a type of harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender.

5.0.2 Sexual harassment includes unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature, or which is directed at an individual because of that individual's sex when:

- Conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment; or
- Submission of such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

5.0.3 Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

5.0.4 Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called "quid pro quo" harassment.

6.0 Examples of Sexual Harassment

6.0.1 The following provides examples of conduct that may be unlawful sexual harassment and that are strictly prohibited:

- Physical acts of a sexual nature, such as:
 - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body or poking another employee's body; or
 - Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
 - Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments; or
 - Subtle or obvious pressure for unwelcome sexual activities.
- Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.

Questions or concerns? Please contact the Human Resources Team: HR@curiaglobal.com
www.curiaglobal.com

- Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace, including, without limitation, displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender.

7.0 Who can be a target of sexual harassment?

Sexual harassment can occur between any individuals, regardless of their sex or gender. It can be directed at employees, paid or unpaid interns, and non-employees, including independent contractors, and those employed by companies contracting to provide services in the workplace. Harassers can be a superior, a direct or indirect report, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

8.0 Where can sexual harassment occur?

Sexual harassment is not limited to the physical workplace itself. It can occur wherever an employee performs worked, such as traveling for business, meetings outside of the office or at Company-sponsored events or parties. Calls, workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

9.0 Retaliation

9.1 Retaliation can be any action that could discourage a worker from coming forward to make or support a harassment claim. Adverse action need not be job-related or occur in the workplace to constitute retaliation (e.g., threats of physical violence outside of work hours).

9.2 Federal, state and local laws protect a individuals from retaliation who:

- make a complaint of harassment in good faith either with the employer or with any a government agency responsible for investigating and enforcing discrimination laws;
- testifies or assists in an investigation or legal proceeding involving harassment;
- opposes harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment;
- reports that another employee has been harassed; or
- encourages a fellow employee to report harassment.

10.0 Reporting And Investigating Complaints of Harassment or Retaliation

10.1 Preventing harassment or retaliation is everyone's responsibility. The Company cannot prevent or remedy harassment or retaliation unless it knows about it. The Company encourages employee and other individuals who has been subjected to behavior that may constitute harassment or retaliation in violation of this Policy to immediately report such behavior to a supervisor or another member of management or to a Human Resources Representative. The Company also provides individuals with the option of reporting harassment or retaliation, including on an anonymous basis, by telephone, e-mail or online to a third party administrator of the Company's compliance reporting system. Please see **the Code of Ethics and Business Conduct Policy** for further information on how to report matters through this compliance reporting system or through the Ethics and Compliance Hotline at 1-888-475-0480..

10.2 Supervisors and other members of management have an affirmative obligation to prevent, stop and report any harassment or retaliation occurring in the workplace or otherwise involving an employee. If a supervisor or any other member of management observes, suspects or receives a complaint of harassment or retaliation occurring in the workplace or otherwise involving an employee, the member of management must immediately notify a Human Resources Representative. A supervisor or other member of management who fails to prevent, stop and report harassment or retaliation as required by this Policy may be subject to discipline up to and including termination of employment.

10.3 The Company will promptly and thorough investigate all reports of harassment or retaliation in violation of this Policy. Human Resources Representatives will immediately notify the Chief Human Resources Officer ("CHRO") and General Counsel ("GC") of the Company of all reports of suspected harassment or retaliation. Upon receipt of a report of harassment or retaliation, the CHRO and GC will assign a member of the Human Resource Department or Legal Department, or an outside representative, to promptly and thoroughly investigate the matter and to provide executive management with the investigation findings and recommended corrective actions. All reports and investigations of harassment or retaliation will be treated with proper care and discretion, and information provided will be revealed on a strictly "need-to-know" basis. If an investigation determines that harassment or retaliation has occurred in violation of this Policy, the Company will take appropriate corrective action.

10.4The Company does not discourage nor obstruct individuals from filing a complaint of harassment or retaliation with the U.S. Equal Employment Opportunity Commission or any other federal, state or local government agency. No adverse actions will be taken against individuals in retaliation for filing a such complaint in good faith with a government agency.

10.5 Any questions from a government agency or an outside attorney concerning a matter covered this Policy should be referred to a member of the Curia Legal Department. Any questions from individual concerning a matter covered by this Policy should be referred to a member of the Human Resources Department.

Approved by: SVP, Chief Human Resources Officer