

DISCRIMINATION AND HARASSMENT PREVENTION POLICY

Greenfire is an equal opportunity employer and subject to the Native American Preference, and makes employment decisions solely based on current need and merit. Creating an inclusive and professional environment where employees feel comfortable, safe, and free from inappropriate and disrespectful conduct is a core value here. All employees and subcontractors working on our jobsites, as well as guests, clients, and vendors, are expected to adhere to this policy.

Greenfire does not discriminate against or tolerate harassment of its employees by or towards another employee, supervisor/manager/leader, or third party for any reason including, but not limited to the following Protected Characteristics: race (including hair that is part of the cultural identification of an ethnic group or that is a physical characteristic of an ethnic group, such as braids, locks or twists), creed, color, sex, sexual orientation, gender identity, height, weight, marital status, changes in marital status, protective order status, arrest and conviction record history, use of honesty testing, military service, unfavorable discharge from military service, use of genetic testing, pregnancy, childbirth, pregnancy-related conditions, parenthood age, age (40 or older), religion, ancestry, national origin, citizenship status, work authorization status or term, arrest record, expunged or sealed convictions, disability, use or nonuse of lawful products off the employer's premises during non-working hours, and declining to attend a meeting or to participate in any communication about religious or political matters.

Greenfire also prohibits discrimination and harassment based on the perception that an employee falls within one of the categories of Protected Characteristics, or based on the employee's association with a person who falls within, or is perceived to fall within, one of the categories of Protected Characteristics. These prohibitions apply in the workplace, on business trips, during business meetings, at business-related social events, and at any other location where a Greenfire-sponsored event takes place.

This policy extends to all work-related interactions, whether in person, vi telephone, in writing or through electronic communications such as e-mail, text messages, instant messages, blogs, electronic conferencing and social media postings regardless of whether they are made through a computer, cell phone, pager or other electronic device or medium.

HARASSMENT

Harassment is prohibited and can be unlawful. Harassment may take many forms, including: *verbal harassment* (e.g., jokes, epithets, slurs, negative stereotyping, and unwelcome remarks about an individual's body, color, physical characteristics, appearance, or sexual practices, or gossiping about sexual relations); *physical harassment* (e.g., physical interference with normal

work, impeding or blocking movement, assault, unwelcome physical contact, or leering at a person's body); or *visual harassment* (e.g., offensive or obscene pictures or emails, gestures, display of sexually suggestive or lewd objects, unwelcome notes or letters, and any other written or graphic material in the workplace that denigrates or shows hostility toward an individual because of a protected characteristic

Harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of that person's race, skin color, religion, gender, national origin, age, disability, or any other protected status. Harassment can also occur if conduct is directed toward a person's relatives, friends, or associates.

Harassment does one or more of the following:

- It has the purpose or effect of creating an intimidating, hostile, or offensive work environment, whether such effect was intended.
- It has the purpose or effect of unreasonably interfering with an individual's work performance, whether such effect was intended.
- It otherwise adversely affects an individual's employment opportunities.

SEXUAL HARASSMENT

Sexual harassment will not be tolerated. Sexual harassment is a form of unlawful sex discrimination that includes unwelcome verbal or physical conduct of a sexual nature including, but not limited to, sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Sexual harassment includes unwelcome sexual behavior, by either men or women. It also includes sex-based harassment directed at someone because of their gender.

Conduct will be considered sexual harassment where:

- Submission to the conduct is either an explicit or implicit term or condition of employment.
- Submission to or rejection of the conduct is used as the basis for employment decisions affecting the person submitting to or rejecting the conduct.
- The conduct has the purpose or effect of substantially interfering with an individual's work performance.
- The conduct creates an intimidating, hostile, or offensive work environment.

Examples of prohibited sexual harassment or other harassing or offensive behaviors include, but are not limited to:

- sexual and other offensive jokes told in person or through any electronic device,
- sexual innuendo, language or images sent through texts, instant messages, e-mail or other electronic device (“sexting”),
- intimidation, sabotaging, physical assaults or threats,
- slurs, epithets or name calling,
- posting offensive messages on social media sites,
- unwelcome conduct of a sexual nature including, but not limited to, sexual flirtations, advances or propositions,
- sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an employee’s employment position,
- requests for sexual favors or conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment, or (2) submission to or rejection of such conduct by an individual is used as the basis for any employment decision affecting the individual,
- such conduct has the purpose or effect of substantially interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment,
- ridicule, mockery, insults or put-downs told in person or through any electronic device
- physically displaying or sending discriminatory, sexually suggestive or other offensive objects or pictures, including photos, posters, calendars, graffiti, drawings and cartoons or language, including jokes, through any medium, including electronically, in person, interoffice mail, or any other manner,
- interference with work performance,
- leering, staring, unwelcome touching or physical closeness, and
- using Company-provided electronic devices (including computers, pagers, and cell phones) to view, display or distribute pornography or other offensive content.

RETALIATION

Retaliation by any person for reporting incidents, making a complaint, or participating in an investigation of harassment or discrimination, or perceived harassment or discrimination, is strictly prohibited.

COMPLAINT AND INVESTIGATION OF DISCRIMINATION, HARASSMENT, AND/OR RETALIATION

If employees believe they have been subjected to harassment, discrimination, or retaliation of any kind, employees must immediately report the conduct to their supervisor, Human Resources, or both. If employees do not feel comfortable discussing the matter with their supervisor, employees should bring the matter to the attention of Human Resources, another supervisor, or the President. Employees should bring the matter to the attention of Greenfire promptly so that it can be investigated and addressed appropriately. Supervisors must report any complaints of misconduct, including harassment, discrimination, or retaliation, to Human Resources or the President as soon as possible so Greenfire can attempt to resolve the claim internally.

All complaints will be promptly and thoroughly investigated by qualified personnel in a fair and impartial manner. The investigation will be documented and tracked. Greenfire will keep all information disclosed during the investigation confidential, except as necessary to conduct the investigation, take any remedial action, and/or follow any applicable law. All employees and supervisors have a duty to cooperate in the investigation of alleged harassment, discrimination, or retaliation. Failing to cooperate or deliberately providing false information during an investigation may result in disciplinary action up to and including termination of employment. If Greenfire determines a violation of its policy has occurred, it will take effective remedial action. Greenfire will take steps to prevent any further violations of policy.

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate Supervisor or a member of the Human Resources Department. Employees may raise concerns and make reports without fear of retaliation. Anyone found to be engaging in any type of unlawful discrimination or retaliation will be subject to disciplinary action, up to and including termination of employment.

RESPONSIBILITY**Management**

Greenfire managers and supervisors are responsible for keeping the work environment free of all harassment and discrimination, and for ensuring that all employees are fully aware of Greenfire's harassment policy. Greenfire managers and supervisors have an obligation to report any conduct that could be considered workplace harassment, sexual harassment, or discrimination to Human Resources, regardless of how the manager or supervisor becomes aware of such conduct. Failure

to report any incidents(s) of harassment, sexual harassment, or discrimination may subject a manager or supervisor to disciplinary action, up to and including termination.

Employees

Any employee who becomes aware of an incident of harassment, sexual harassment, or discrimination, whether by being the victim, witnessing the incident, or being told of it, has an obligation to report it to his or her supervisor, the Human Resources Department, or any manager in the Company with whom they feel comfortable. The incident will be immediately reported to the Human Resources Department or President as may be appropriate.

Investigation

All reports will be promptly investigated by the Human Resources Department with due regard for the privacy of everyone involved. Confidentiality shall be maintained to the extent reasonably possible.

Retaliation is Prohibited

Greenfire prohibits retaliation against any individual who makes a good-faith report of discrimination, harassment, sexual harassment, or participates in an investigation of such reports. Retaliation against an individual for reporting or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy. Any person who is found to have retaliated against another individual in violation of this policy will be subject to disciplinary action, up to and including termination.

Action

An employee found to have harassed a fellow employee or subordinate in any fashion, will be subject to disciplinary action, up to and including termination. A non-employee who harasses employees or guests, or otherwise creates a hostile environment in the workplace, will be asked to leave the premises. If such a person is uncooperative, security and/or police will be notified that removal is necessary.

Greenfire Employees can be assured that:

- Employees can raise concerns and make good-faith reports without fear of retaliation.
- Greenfire will act promptly to quickly investigate all harassment complaints and will keep information confidential to the greatest extent possible when processing complaints.
- Anyone engaging in sexual or other unlawful harassment will be subject to disciplinary action, up to and including termination of employment.

All managers and supervisors are responsible for the implementation of this policy and for ensuring that employees know and understand this policy. All employees will be held responsible and accountable for eliminating prohibited conduct.

Questions regarding this policy should be addressed directly to Human Resources who have overall responsibility for investigating and resolving harassment complaints at Greenfire.

All employees are encouraged to report any acts of violence or harassment to the attention of their supervisor and the GMS Human Resources department.

If any Greenfire employee, or subcontractor working on a jobsite has concerns or would like to provide information regarding an incident, we ask you to please contact the GMS Human Resources department. ALL REPORTS AND SHARED INFORMATION WILL BE KEPT CONFIDENTIAL.

Daylanne Mendoza
GMS - Human Resources Manager
Office: (414) 290-9448
Email: daylanne.mendoza@greenfire.com

Greenfire is committed to accomplishing the goals of this policy and expects all employees to do the same. By working together, Greenfire will be a positive and productive work environment for everyone.