



Anti-Harassment/Anti-Discrimination Policy

Policy Number: CORP-POL-00041

Policy Owner: Director of Human Resources

Contacts: Legal & Compliance (legal@vybond.com), Human Resources

Confidential Reporting: Paycom Ethics Helpline (24/7, anonymous). Retaliation is prohibited under [Vybond Non-Retaliation Policy CORP-POL-00020](#).

Purpose

The purpose of this Policy is to ensure a safe, respectful, and inclusive workplace free from harassment, discrimination, and retaliation, and to outline the Company's expectations, reporting processes, and investigative standards. Vybond is committed to promptly addressing inappropriate behavior, preventing recurrence, and holding violators accountable. This Policy is intended to ensure compliance with applicable federal, state, and local laws governing workplace fairness, including Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA), the Age Discrimination in Employment Act (ADEA), the Equal Pay Act, the Genetic Information Nondiscrimination Act (GINA), and comparable federal state and local anti-discrimination and anti-harassment laws.

Scope

Vybond intends to provide a work environment that fosters respect and dignity among employees, customers, vendors, and all those with whom we work. Therefore, we expect employees to treat co-workers, customers, vendors, and others with respect and dignity. Consistent with this policy, the Company expects that our work environment will be professional, civil, and free from unwelcome, inappropriate conduct, including prohibited harassment. This policy is intended to apply to all Company locations worldwide and covers conduct that occurs:

- In any Vybond facility, worksite, or office
- During work-related travel or off-site business activities
- In virtual environments (Teams, email, messaging systems)
- At Company-sponsored events
- In interactions with customers, suppliers, vendors, and business partners.

Definitions

Sexual Harassment. Unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature where the individual is made to feel as if he or she must agree to the request or submit to the advance in order to get favorable treatment at work. Sexual harassment also includes sexually-oriented conduct and communications which unreasonably interfere with an employee's work performance or create an intimidating, hostile, or offensive environment. Please see the Policy section for a list of examples.

Harassment (Other Protected Characteristics) Verbal, written, electronic, or physical conduct based on any legally protected characteristic—including race, color, religion, creed, sex (including pregnancy, childbirth, related conditions, sexual orientation, gender identity or expression), national origin, age, disability (including physical, mental, or cognitive impairments as defined under the Americans with Disabilities Act (ADA) and applicable state disability laws), genetic information, veteran status, or any



other protected class—that unreasonably interferes with work performance or creates a hostile, intimidating, or offensive work environment. Conduct may occur in person, electronically, or through Company systems. Please see the Policy section for a list of examples.

Discrimination. Discrimination means any unequal, adverse, or unfair treatment of an individual or group based on a legally protected characteristic. Prohibited discrimination includes decisions or actions affecting hiring, promotion, job assignments, training opportunities, compensation, scheduling, discipline, access to benefits, workplace conditions, or any other term or condition of employment. Discrimination may occur through intentional actions or through workplace practices that have a discriminatory effect, regardless of intent. Please see the Policy section for a list of examples.

Retaliation. Any adverse action, subtle or overt, taken because an individual makes a good faith report, intervenes as a bystander, or participates in an investigation. Retaliation is strictly prohibited.

Policy

Vybond expressly prohibits discrimination, harassment, and retaliation in all forms and from any source – including supervisors, coworkers, subordinates, contractors, suppliers, customers, or visitors.

Vybond is committed to ensuring equal employment opportunity in all aspects of employment. The Company strictly prohibits discrimination against any individual based on race, color, religion, creed, sex (including pregnancy, childbirth, related conditions, sexual orientation, gender identity or expression), national origin, age, disability, genetic information, veteran status, or any other characteristic protected by federal, state, or local law. All employment decisions must be based on legitimate business factors and applied consistently and fairly.

All Vybond Personnel are expected to:

- Treat others with dignity and respect and comply with this Policy and the Code of Ethics;
- Avoid conduct that could reasonably be perceived as harassing, discriminatory, or retaliatory;
- Report concerns promptly through the channels below;
- Cooperate in investigations and follow confidentiality instructions when given.

Harassment that is forbidden by this policy can take several forms, including but not limited to:

- **Sexual Harassment.** Unwelcome sexual advances violate this policy even if directed at a co-worker, temporary worker, supervisor, customer or vendor. While not exhaustive, the following is a list of some examples of sexual harassment:
 - Unwanted sexual advances or propositions.
 - Offering employment benefits in exchange for sexual favors.
 - Making or threatening reprisals after a negative response to a sexual overture.
 - Visual conduct such as leering, making sexual gestures, displaying or distributing sexually suggestive objects or pictures, cartoons or posters.
 - Verbal conduct such as making or using sexually derogatory comments, epithets, slurs, or jokes.
 - Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letter, notes or invitations.



- Physical conduct such as unwanted touching, assault, or impeding or blocking movements.
- **Harassment Based on Protected Characteristics.** Harassment based on a legally protected category may take many forms. While it is not possible for Vybond to provide an exhaustive list, the following is a list of some examples of harassing behavior that is prohibited:
 - Jokes, insults or slurs that target a protected characteristic;
 - Posting, sharing, or displaying offensive cartoons, drawings, memes, or messages (including electronic communications);

Harassment is assessed based on the perspective of a reasonable person in the complainant's position, not solely the intent of the actor.

Prohibited Discriminatory Conduct

Examples of discriminatory conduct that violate this Policy include, but are not limited to:

- Denying employment opportunities, promotions, training, or desirable assignments because of a protected characteristic;
- Applying policies or performance standards inconsistently to different employees based on protected characteristics;
- Reducing hours, altering schedules, or imposing disciplinary action in a manner influenced by bias;
- Excluding an employee from meetings, communications, projects, or advancement opportunities based on a protected characteristic;
- Refusing to provide required or reasonable accommodations for disabilities, pregnancy-related needs, or sincerely held religious beliefs;
- Making employment decisions based on assumptions, stereotypes, or generalizations related to a protected class.

Reasonable Accommodations

Vybond provides reasonable accommodations for qualified individuals with disabilities, for pregnancy and related conditions, and for sincerely held religious beliefs or practices, unless doing so would create an undue hardship on the ordinary operation of the company's business. Such accommodations can include modifications or adjustments to the work environment or circumstances under which the employee's position is customarily performed, including but not limited to more frequent or longer breaks; seating accommodations or acquisition or modification of equipment; assistance with manual labor, light duty, or a temporary transfer to a less strenuous or non-hazardous position; job restructuring or a part-time or modified work schedule; appropriate adjustment or modifications of examinations or training materials; assignment to a vacant position; or providing leave to recover from childbirth or pregnancy.

Employees requesting accommodation should inform Human Resources or their supervisor. Vybond will engage in an interactive process to determine appropriate accommodations and will not retaliate against anyone for requesting accommodation.

Please note that employees seeking accommodation may be required to provide certification from a health care provider concerning the need for reasonable accommodation to the same extent such a certification is required for other conditions related to a disability. Such certification would include:



- medical justification for the requested accommodation(s);
- a description of the reasonable accommodation(s) medically advisable;
- the date the accommodation(s) became advisable; and
- the probable duration of the reasonable accommodation(s).

The Company will not deny employment opportunities or take adverse employment actions against employees based on Company's need to make a reasonable accommodation, and Company will not retaliate against employees who request an accommodation or otherwise exercise their rights to do so.

Equal Employment Opportunity (EEO)

Vybond provides equal employment opportunities to all applicants and employees. Employment decisions—including recruitment, hiring, assignment, training, evaluation, promotion, compensation, discipline, and termination—must be based on merit, qualifications, and business needs. Any deviation from EEO standards due to a protected characteristic is strictly prohibited.

Reporting

Anyone who experiences, witnesses, or becomes aware of harassment, discrimination, or retaliation must report the conduct immediately. Reporting options include: (a) a supervisor or manager; (b) Human Resources; (c) Legal & Compliance (legal@vybond.com); or (d) the Paycom Ethics Helpline (24/7, anonymous). If the concern involves your supervisor or local HR, report directly to Corporate HR, Legal & Compliance, or the Helpline.

Employees should report concerns involving discrimination even when the behavior does not involve harassing conduct. Examples include perceived bias in promotion, denial of training opportunities, exclusion from key meetings, or inconsistent application of discipline. All such concerns will be reviewed promptly and thoroughly.

Employees who witness discriminatory behavior or employment decisions that appear to be influenced by bias are encouraged to report their concerns. Vybond supports good-faith bystander intervention and prohibits retaliation against anyone who raises a concern or assists another employee in making a report.

Managers and supervisors who receive a complaint must escalate to Human Resources immediately.

Investigations & Confidentiality

Vybond will conduct prompt, thorough, fair, and impartial investigations. All Personnel are expected to cooperate fully, refrain from interference, and maintain confidentiality when instructed to do so to protect witnesses, preserve evidence, and maintain investigation integrity. Confidentiality will be determined on a case by case basis consistent with applicable law.

Corrective Action

If Vybond determines that this Policy has been violated, it will take appropriate corrective and preventive measures proportionate to the severity of the offense, up to and including termination of employment or



contract. Vybond may also implement interim safeguards (e.g., schedule changes, work-area separation) where appropriate.

Non-Retaliation

Vybond strictly prohibits retaliation against anyone who, in good faith, reports a concern, intervenes as a bystander, or participates in an investigation. Any retaliatory conduct will result in disciplinary action up to and including termination.

False Accusations

Because false accusations may have a serious impact on the person accused, any employee who makes an accusation or files a complaint that they know to be false will be subject to discipline, up to and including immediate termination of employment.

Please help us create a working environment free from discrimination and harassment.

Related Policies & References

- [Code of Ethics & Business Conduct \(CORP-POL-01148\)](#)
- [Equal Employment Opportunity Policy \(CORP-POL-00050\)](#)
- [Workplace Bullying Policy \(CORP-POL-00042\)](#)
- [Global Human Rights Policy \(CORP-POL-00021\)](#)
- [Non-Retaliation Policy \(CORP-POL-00020\)](#)
- [Bystander Intervention Policy \(CORP-POL-00045\)](#)
- [Workplace Violence & Firearms Policy \(CORP-POL-00043\)](#)
- [Records Retention & Destruction Policy \(CORP-POL-00023\)](#)

Roles & Responsibilities

Managers have an affirmative duty to prevent, detect, and promptly escalate reports of harassment, discrimination, or retaliation. Failure to take appropriate action may result in disciplinary consequences.

Managers and supervisors must ensure that employment decisions are made without regard to any protected characteristic. This includes applying performance standards consistently, documenting employment decisions accurately, providing equal access to opportunities, escalating accommodation requests promptly, and proactively addressing any indications of bias, discrimination, or exclusion within their teams.

Disciplinary Action

Violations of this policy may result in disciplinary action, up to and including termination of employment.

Policy Owner/Contact

The Corporate Executive responsible for Human Resources at Vybond is responsible for implementation and oversight of this Policy. Contact HR or Legal & Compliance with questions or to report concerns.

Disclaimer

This Policy will be interpreted consistent with all applicable federal, state, and local laws. This includes, but is not limited to, Title VII, ADA/ADAAA, ADEA, GINA, the Equal Pay Act, and applicable state and local



human rights and fair employment statutes. Vybond reserves the right to apply, interpret, and revise this Policy as it deems appropriate.

Version Control

Date	Version Number	Purpose/Change	Author/Approver
March 1, 2026	1.0	New Policy	Director, Human Resources