

***Human Resource Policy - 0600 (Standard of Conduct & Employee Discipline)***

HR - 0607. HARASSMENT**I. PURPOSE**

To establish the Company's position on the subject of harassment and to set forth guidelines for handling violations of this Policy.

II. SCOPE

This Policy applies to all personnel of Samsung SDS America, Inc. ("SDSA" or "the Company") and other individuals conducting business on SDSA premises.

III. DEFINITION

It is important to understand what "harassment" is in order to determine if harassment occurs. If you are not sure that an incident constitutes harassment, see your supervisor or local Human Resources Representative for assistance. Harassment has many forms. It encompasses, but is not limited to, unwanted conduct towards an individual because of his/her sex, physical or mental disability, race, color, religion, national origin or ancestry, medical condition (including pregnancy, childbirth or related conditions), genetic information, marital status, age, gender identity, or sexual orientation. Moreover, harassment may be expressed in the following manners:

A. Verbal or Written Harassment

Suggestive, insulting, or derogatory comments, epithets, innuendoes, sounds, jokes, teasing, threats, or slurs.

B. Nonverbal or Physical Harassment

Leering, whistling, or making obscene gestures. Assault, impeding or blocking movement, or any unwanted physical contact or interference with normal work or movement, including touching, pinching, brushing the body, or sexual contact.

C. Visual Harassment

Derogatory or offensive posters, cartoons, suggestive objects, pictures, letters, or drawings, either in hard copy or electronic form.

D. Sexual Harassment

Any unwelcome sexual advances, sexual propositions, requests or demands for sexual favors and other conduct of a sexual nature that:

- is made explicitly or implicitly as a term or condition of an individual's employment;
- is used as a basis for employment decisions, such as promotions and benefits affecting the employee; or
- interferes with an employee's work performance or creates an intimidating, hostile, or offensive work environment.

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IV. POLICY

The Company is committed to providing a workplace in which all workforce members are treated respectfully and professionally. Therefore, all Company personnel should understand that incidents of harassment will not be tolerated by the Company, and that the Company will promptly and thoroughly investigate all allegations of such inappropriate behavior. If evidence of harassment by any Company personnel is found, such individual will be subject to disciplinary action up to and including termination of employment.

The Company will also not tolerate incidents of harassment by non-employees (e.g. vendors, third party contractors, trades people, etc.) against SDSA personnel. Executive management based at any SDSA location is responsible for appropriately communicating the intent of this Policy to any non-employees on SDSA premises and for ensuring that any complaints of harassment are handled promptly and effectively.

Finally, the Company reserves the right to respond to harassment even where no one has complained or indicated they have been offended.

V. PROCEDURE

- A. If it is appropriate and sensible and you are comfortable doing so, ask the harasser to stop. Sometimes, people do not realize that their behavior is offensive. Often, a simple conversation will end the unwelcome behavior. However, if you are uncomfortable with confronting the harasser yourself, or if the harasser does not stop his/her behavior after being asked, you should inform your immediate supervisor or local Human Resources Representative.
- B. An investigation of all complaints will be undertaken immediately.
- C. After appropriate investigation, any employee or contractor who has been found by the Company to have harassed another Company personnel in any of the aforementioned ways will be subject to appropriate sanctions depending on the circumstances.
- D. The Company may inform involved parties about the status of reviewing their complaints. However, to respect the privacy and confidentiality of all people involved, the Company might not share specific details of the discipline or other action taken.
- E. The Company will not tolerate retaliation against any personnel who complains about harassment or other inappropriate behavior or who cooperates in an investigation of such allegations.

This Policy was last revised on December 1, 2013. The Company reserves the right to suspend, modify, or withdraw this Policy from time to time as the need arises or in accordance with changes in state and federal laws.

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