
Rose International Anti-Harassment Policy, Non-Retaliation Policy and Complaint Reporting Procedure

Last Revised: 10/15/2020

ANTI-HARASSMENT POLICY

Rose International is committed in all areas in providing and maintaining a workplace environment that is free from unlawful discrimination, abuse and harassment, including sexual harassment, and in which all individuals are treated with respect, fairness, and dignity. This policy defines these terms and provides a complaint procedure for employees who believe they have been victims of prohibited conduct. This policy applies at every level of the organization and includes all employees, applicants for employment, interns, customers, vendors, third-parties, supervisors, managers, co-workers, independent contractors, other relevant individuals and people you may come in contact with at the workplace or at a client site in all matters related to hiring, firing, transfer, promotion, benefits, compensation, and other terms and conditions of employment. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, any form of harassment or discrimination based on any legally protected characteristic is prohibited, including an individual's race, color, sex (including pregnancy), gender, gender expression, gender identity, genetic information, reproductive health decision making, natural hair/hairstyles, hair textures, religious creed (including religious dress and grooming practices), marital status, political affiliation, union membership, national origin, ancestry, military status, veteran status, sexual orientation, age, physical disability, mental disability, medical condition or any other consideration made unlawful by federal, state or local law, regulation, or ordinance is a violation of this policy and will result in disciplinary action, up to and including termination. Rose International also prohibits unlawful discrimination and/or harassment based on the perception that anyone has any of these characteristics, or is associated with a person who has or is perceived as having any of these characteristics. Rose International does not require pregnancy or medical tests, except where required by applicable laws or regulations or prudent for workplace safety, and shall not improperly discriminate based on test results.

Harassment includes but is not limited to: slurs and other offensive remarks, negative stereotyping, threatening, intimidating or hostile acts, jokes, graphic material, or other offensive verbal, written or physical conduct including items sent through email.

Sexual Harassment and Abuse

Rose International is committed to maintaining, and providing employees with, a workplace environment free from all forms of sexual harassment and abuse. Sexual harassment is a form of workplace discrimination. Rose International has a zero-tolerance policy for any form of sexual harassment and all employees are required to work in a manner that prevents sexual harassment in the workplace. This policy is one component of Rose International's commitment to a discrimination-free work environment. Sexual harassment is against the law¹² and will not be tolerated. All employees have a legal right to a workplace free from sexual harassment employees are urged to report sexual harassment by filing a complaint internally with our Human Resources Department at HR@roseIT.com. Employees may also file a complaint with a government agency or in court under federal, state or local antidiscrimination laws.

Rose International does not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.

POLICY

1. Rose International's policy applies to all employees, applicants for employment, interns, contractors and persons conducting business, regardless of immigration status, with Rose International (collectively, "employees"). It also applies to non-employees³, customers, vendors, third-parties, supervisors, managers, co-workers, independent contractors, other relevant individuals and people you may come in contact with at the workplace or at a client site. Therefore, all must follow and uphold this policy which is provided to all employees upon hiring and is also available on our website at:

¹ **For New York residents/employees/non-employees (if applicable):** While this policy addresses sexual harassment, harassment because of and discrimination against persons of all protected classes is prohibited. In New York State, such classes include age, race, creed, color, national origin, sexual orientation, military status, sex, disability, marital status, domestic violence victim status, gender identity and criminal history.

² **For Illinois residents/applicants/employees:** The Illinois Human Rights Act states that you have the right to be free from unlawful discrimination and sexual harassment. Rose International will not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act. This applies to all employer actions, including hiring, promotion, discipline and discharge.

³ If applicable, a non-employee is defined as someone who is (or is employed by) a contractor, subcontractor, vendor, consultant, or anyone providing services in the workplace. Protected non-employees may include persons commonly referred to as independent contractors, "gig" workers and temporary workers or persons providing equipment repair, cleaning services or any other services provided pursuant to a contract with Rose International.

<https://www.roseit.com/AntiHarassmentPolicy/Anti-HarassmentPolicy.pdf>. You may also contact our HR Department by emailing HR@roseIT.com for a copy.

The workplace includes Company premises, a company-sponsored off-site event, traveling on behalf of Company, or conducting Company business, regardless of location.

2. As set forth above, sexual harassment will not be tolerated. Any employee or individual covered by this policy who engages in sexual harassment or retaliation will be subject to remedial and/or disciplinary action (e.g., counseling, suspension, termination).

3. Retaliation Prohibition: No person covered by this policy shall be subject to adverse action because the employee reports an incident of sexual harassment, provides information, or otherwise assists in any investigation of a sexual harassment complaint. Rose International will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected sexual harassment. Any employee of Rose International who retaliates against anyone involved in a sexual harassment investigation will be subjected to disciplinary action, up to and including termination. All employees or non-employees⁴ working in the workplace who believe they have been subject to such retaliation should inform our HR Department at HR@roseIT.com as soon as reasonably practical. Employees and non-employees (if applicable) in New York state who believe they have been a target of such retaliation may also seek relief in other available forums. Please visit our website at <https://www.roseit.com/Anti-HarassmentPolicy/New York State Legal Protections and External Remedies.pdf> for more information.

4. Sexual harassment is offensive, is a violation of our policies, is unlawful, and may Rose International to liability for harm to targets of sexual harassment. Harassers may also be individually subject to liability. Employees of every level who engage in sexual harassment, including managers and supervisors who engage in sexual harassment or who allow such behavior to continue, will be penalized for such misconduct (up to and including termination). In addition, sexual harassment that constitutes sexual assault or other criminal law violations will be referred to the appropriate authorities for prosecution.

5. Rose International will conduct a prompt and thorough investigation that ensures due process for all parties, whenever our HR Department receives a complaint about sexual harassment. If managers or supervisors receive a complaint, information or otherwise knows of possible sexual harassment occurring, they must report it to our HR Department at HR@roseIT.com. Our HR Department will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever sexual harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment.

6. All employees are encouraged to report any harassment or behaviors that violate this policy. Rose International will provide all employees with a complaint form for employees to report harassment and file complaints.

7. Managers and supervisors are required to report any complaint that they receive, or any harassment that they observe or become aware of, to our HR Department at HR@roseIT.com.

8. All Rose employees are expected to:

- engage in conduct that meets professional standards,
- remain sensitive to the effect of their actions and words on others,
- take appropriate action and work in a manner to prevent sexual harassment in the workplace,
- avoid behavior that might be construed as sexual harassment, and
- acquaint themselves with this policy.

9. Rose International does not tolerate discriminatory conduct, harassment, or sexual assault. Any individual found to have engaged in such conduct may face disciplinary action up to, and including, termination. Company may also subject managers and supervisors who fail to report known harassment – or fail to take prompt, appropriate corrective action – to disciplinary action, including potential termination.

⁴ If applicable, a non-employee is defined as someone who is (or is employed by) a contractor, subcontractor, vendor, consultant, or anyone providing services in the workplace. Protected non-employees may include persons commonly referred to as independent contractors, "gig" workers and temporary workers or persons providing equipment repair, cleaning services or any other services provided pursuant to a contract with Rose International.

What is "Sexual Harassment?"

Sexual harassment is a form of sex discrimination and is unlawful under federal, state and local law (where applicable). It includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender. It also includes unsolicited, unwanted and unwelcome sexual advances, requests for sexual favors, or other verbal, visual or physical conduct of a sexual nature directed at an individual because of that individual's sex, when:

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

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. 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. It may also encompass other forms of unwelcome, hostile, intimidating, threatening, humiliating, or violent behavior that may not necessarily be illegal, but still prohibited by this policy.

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.

Any employee who feels harassed should report so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

Examples of Sexual Harassment

The following describes some types of acts/conduct that may constitute sexual harassment or a sexually harassing hostile work environment 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;
 - Rape, sexual battery, molestation or attempts to commit these assaults.
- Foul language of an offensive sexual nature, sexual propositions, sexual jokes or remarks.
- Non-verbal harassment, including but not limited to suggestive or insulting sounds, obscene gestures, leering or whistling.
- Subtle or overt pressure for sexual favors, accompanied by implied or overt threats concerning one's job, or physical well-being.
- Insults, pranks, signs, words, humor, jokes, and/or anecdotes that belittle or demean an individual's or a group's sexuality or sex;
- Unwelcome or unwanted sexual comments or inquiries about an individual's or a group's sexuality or sex;
- Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- 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, discriminatory or inappropriate displays, reading/promotional materials or publications of pornographic, demeaning, derogatory or sexually explicit pictures, cartoons, drawings or caricatures, or sexually suggestive objects or pictures, which may include but not be limited to posters, graffiti, pin-ups, calendars, cell phones and computer screen-savers.
- Use of the computer system for the purpose of viewing, displaying, or disseminating material that is sexual in nature.

- Unauthorized entering of restrooms and other locations reserved for the exclusive use of the opposite sex.
- Unwelcome or 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.
- Verbal harassment, including but not limited to disparaging or disrespectful comments, jokes, slurs, innuendoes, teasing, and other sexual talk such as personal inquiries, persistent unwanted courting and derogatory insults.
- 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;
 - Subtle or obvious pressure for unwelcome sexual activities.
- Unwanted, unnecessary or unwelcome physical contact or touching, such as patting, pinching, hugging, impeding or blocking movement, any physical interference with work, or repeated brushing against an individual's body.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
 - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
 - Sabotaging an individual's work;
 - Bullying, yelling, name-calling.
- Sexual Assault.

Consensual Relationships

Although Rose International recognizes that consensual relationships are within the realm of individual privacy, it is necessary to advise that these relationships, particularly those occurring between supervisors and staff, can lead to circumstances that can be interpreted as sexual harassment.

Consensual relationships can also be interpreted as causing a hostile or offensive work environment when other staff members believe that the person(s) is/are receiving favorable treatment in employment decisions.

We trust that all employees will continue to act responsibly and help to establish a pleasant working environment free of discrimination. Rose International encourages any employee to raise questions he or she may have regarding discrimination with our HR Department by emailing HR@roseIT.com.

Who can be a target of sexual harassment?

Sexual harassment can occur between any individuals, regardless of their sex or gender. Various state laws (i.e. New York) protect employees, and non-employees, including independent contractors, and those employed by companies contracting to provide services in the workplace. Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

Where can sexual harassment occur?

Unlawful sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

RETALIATION

Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a sexual harassment claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours). Such retaliation is unlawful under federal, state, and (where applicable) local law.

Residents/Employees in New York State

The New York State Human Rights Law protects any individual who has engaged in "protected activity." Protected activity occurs when a person has:

- made a complaint of sexual harassment, either internally or with any anti-discrimination agency;
- testified or assisted in a proceeding involving sexual harassment under the Human Rights Law or other anti-discrimination law;
- opposed sexual harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment;

- reported that another employee has been sexually harassed; or
- encouraged a fellow employee to report harassment.

All Residents/Employees

Even if the alleged harassment does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith belief that the practices were unlawful. However, the retaliation provision is not intended to protect persons making intentionally false charges of harassment.

REPORTING HARASSMENT

Rose International takes all complaints regarding discrimination, sexual harassment and/or harassment in the workplace very seriously. **Preventing sexual harassment is everyone's responsibility.** Rose International cannot prevent or remedy sexual harassment unless it knows about it.

Complaint Process

All employees and non-employees (if applicable) who have been subjected to behavior that may discrimination, harassment (including sexual harassment), retaliation and/or denied accommodation (for a disability, pregnancy, childbirth or related medical condition, or for religious beliefs and/or practices) are encouraged to report such behavior to our HR Department at HR@roseIT.com. Anyone who witnesses or becomes aware of potential instances of sexual harassment should also report such behavior to our HR Department by contacting HR@roseIT.com

Reports of discrimination or sexual harassment must be submitted in writing with as much detail as possible to our HR Department at HR@roseIT.com⁵. You may find a copy of our Incident Report/Complaint form on our website at: https://www.roseit.com/Anti-HarassmentPolicy/Incident_Report_Form_Rose_10_9_18.pdf. You may also contact our HR Department to request a copy by emailing HR@roseIT.com.

Employees or non-employees (if applicable) who believe they have been a target of sexual harassment may also seek assistance or relief in other available forums⁶, including a government agency (the Department of the U.S. Equal Opportunity Commission (EEOC)) or in a court under federal, state or local anti-discrimination laws. Please visit <https://www.eeoc.gov/employees/charge.cfm> for more information.

Supervisory/Managerial Responsibilities

All supervisors and managers who receive information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, **are required** to report such suspected sexual harassment immediately to our HR Department at HR@roseIT.com. In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected sexual harassment or otherwise knowingly allowing sexual harassment to continue.

Supervisors and managers will also be subject to discipline for engaging in any retaliation.

Complaints and Investigations of Sexual Harassment

All formal written complaints submitted to our HR Department at HR@roseIT.com will be investigated.⁷ If complaints or information are provided verbally, our HR Department will transcribe such information onto an Incident Report/Complaint

⁵ **For New York residents/employees/non-employees (if applicable):** Reports of sexual harassment may be made verbally or in writing. A form for submission of a written complaint may be found on our website at: https://www.roseit.com/Anti-HarassmentPolicy/New_York_State_Legal_Protections_and_External_Remedies.pdf. You may also request a copy by emailing our HR Department at HR@roseIT.com. All employees and non-employees (if applicable) are encouraged to use this complaint form. Individuals reporting sexual harassment on behalf of other employees/non-employees (if applicable) should use the complaint form and note that it is on another employee's/non-employee's (if applicable) behalf.

⁶ **For New York residents/employees/non-employees (if applicable):** Please visit our website at https://www.roseit.com/Anti-HarassmentPolicy/New_York_State_Legal_Protections_and_External_Remedies.pdf for more information on available forums.

⁷ **For New York residents/employees/non-employees (if applicable):** All complaints or information about sexual harassment will be investigated, whether that information was reported in verbal or written form. If provided verbally, our HR Department will transcribe such information onto an Incident Report/Complaint Form and will provide it to the individual for signature.

Form and will provide it to the individual for signature. Investigations will be conducted in a timely manner and will be confidential to the extent possible.

Upon receipt of a written complaint (or verbal complaint transcribed into a formal complaint and signed by the individual) of suspected discrimination and/or sexual harassment, our HR Department will promptly undertake an effective, objective and thorough investigation. The investigation will be conducted in a professional manner as to protect all parties involved and will be kept confidential to the extent possible. All persons involved, including complainants, witnesses and alleged harassers will be accorded due process to protect their rights to a fair and impartial investigation.

Any employee may be required to respond to questions and to cooperate as needed in an investigation of a complaint suspected discrimination or harassment, including sexual harassment. During the complaint process, it is Rose International's policy to ensure an employee is provided with a timely response, an impartial, fair, thorough and timely investigation by qualified personnel, documentation and tracking for reasonable progress, immediate and appropriate options for remedial actions and resolutions upon completion of the investigation and timely closures.

All complaints of unlawful harassment, including the identity of individuals reporting harassment, alleged victims, witnesses and alleged harassers, will be handled in as discreet and confidential a manner as is possible under the circumstances and to the extent permitted by law. It is Rose International's intent to reach reasonable conclusions based on evidence collected. If at the end of the investigation misconduct is found, appropriate remedial measures shall be taken.

Our HR Department will document any reported incident(s) involving prohibited conduct and employment discrimination, including sexual assault, as defined under applicable law. It is also recommended that employees document any such incident(s).

Employees are encouraged to report conduct that they believe may be prohibited harassment (or that, if left unchecked, may rise to the level of prohibited harassment), even if they are not sure that the conduct violates this policy. Employees are also cautioned against using peer pressure to discourage harassment victims from complaining. Retaliation is strictly prohibited and individuals who report harassing conduct, participate in investigations, or take any other actions protected under federal employment discrimination laws will not be subjected to retaliation. Rose International will not tolerate retaliation against employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

As indicated above, employees may also direct a complaint to the Department of the U.S. Equal Opportunity Commission (EEOC) as an additional avenue.⁸ Please visit <https://www.eeoc.gov/employees/charge.cfm> for more information.

Residents/Employees in New York State

For employees and non-employees (if applicable) in New York, please visit our website at https://www.roseit.com/Anti-HarassmentPolicy/New_York_State_Investigation_Process.pdf for more information on investigation procedures for verbal or written complaints of sexual harassment. If a complaint is verbal, our HR Department will encourage the individual to complete the "Incident Report/Complaint Form" in writing. If he or she refuses, our HR Department will prepare an Incident Report/Complaint Form based on the verbal reporting and will provide it to the individual for signature.

Residents/Employees in Illinois State

To report discrimination, you may:

- 1) Contact our HR Department at HR@roseIT.com.
- 2) Contact the Illinois Department of Human Rights (IDHR) to file a charge.
- 3) Call the Illinois Sexual Harassment and Discrimination Helpline at 1 (877) 236-7703 to talk to someone about your concerns.

For more information, including contact information for the IDHR, please visit: www.illinois.gov/dhr or <https://www2.illinois.gov/dhr/Publications/Documents/SH%20and%20DISCRIMINATION%20EMPLOYEE%20POSTER.pdf>.

Frivolous Complaints

If harassment allegations are not substantiated, all reasonable steps shall be taken to protect the reputation of the

⁸ For New York residents/employees/non-employees (if applicable): Please visit our website at https://www.roseit.com/Anti-HarassmentPolicy/New_York_State_Legal_Protections_and_External_Remedies.pdf for more information on available forums.

accused. Moreover, if the complainant is found to have intentionally or maliciously been dishonest or frivolous in making the allegations, the complainant shall be subject to appropriate disciplinary action.

RIGHT OF ACTION, LEGAL PROTECTIONS AND EXTERNAL REMEDIES

Sexual harassment is not only prohibited by Rose International but is also prohibited by state, federal, and, where applicable, local law. Aside from the internal process at Rose International, employees may also choose to pursue legal remedies with a following governmental entity such as the EEOC. While a private attorney is not required to file a complaint with a governmental agency, you may seek the legal advice of an attorney.

Contact the Local Police Department

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact your local police department.

Residents/Employees in New York State

For employees and non-employees (if applicable) in New York, please visit our website at https://www.roseit.com/AntiHarassmentPolicy/New_York_State_Legal_Protections_and_External_Remedies.pdf for more information on legal protections and external remedies.

Residents/Employees in Oregon State

Nothing in this policy precludes any person in the state of Oregon from filing a formal grievance in accordance with a collective bargaining agreement (if applicable), the Bureau of Labor Industries' Civil Rights Division, or the EEOC. Oregon state law requires that any legal action taken on alleged discriminatory conduct (specifically that prohibited by ORS 659A.030, 659A.082 or 659A.112) commence **no later than five (5) years** after the occurrence of the violation. Other applicable laws may have a shorter time limitation on filing. The five (year) statute of limitations runs from the date of occurrence of the alleged unlawful practice.

NON-DISCLOSURE/NON-DISPARAGEMENT AGREEMENTS

Under this policy, a non-disclosure agreement is any agreement by which one or *more parties agree not to discuss or disclose information regarding any complaint of work-related harassment, discrimination, or sexual assault.*

A non-disparagement agreement is any agreement by which one or more parties agree not to discredit or make negative or disparaging written or oral statements about any other party or the company.

A no-rehire provision is an agreement that prohibits an employee from seeking reemployment with the company and allows a company to not rehire that individual in the future.

Employees will not be required or coerced into entering into any non-disclosure or non-disparagement agreement if the purpose or effect of the agreement prevents the employee from disclosing or discussing conduct constituting discrimination, harassment, or sexual assault.

Employees alleging to be aggrieved by discrimination, harassment, or sexual assault may, however, voluntarily request to enter into a settlement, separation, or severance agreement which contains a non-disclosure, non-disparagement, or no-rehire provision and will have at least seven (7) days after execution to revoke any such agreement.

No agreement voluntarily requested by an employee will become effective until after this seven (7) day revocation period has expired.

NON-RETALIATION POLICY

Rose International strictly prohibits retaliation against any employee who opposes, reports or assists another person in reporting suspected discrimination, sexual harassment, and/or other harassment in the workplace. Employees who come forward in good faith to report any incident of suspected discrimination, sexual harassment, and/or harassment in the workplace will be protected from retaliation for having done so. Similarly, employees who participate in good faith in an investigation of reported misconduct will be protected from retaliation for having done so.

"Retaliation" occurs when a person experiences an adverse action because he or she: filed a complaint alleging prohibited discrimination (including harassment); participated in or cooperated with an investigation in any way; exercised the right



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to take leave (as allowed under federal, state or local law); exercised the right to take leave (as allowed under federal, state or local law) for domestic violence, sexual assault, stalking or other domestic violence-related crime; or otherwise objected to or reported a practice that he or she reasonably believed was unlawful, unethical, or in violation of Rose International policy.

Rose International's non-retaliation policy applies to all persons involved in the operation of the Company, including all employees, supervisors and those in management, as well as all persons doing business with or for Rose International, including vendors, customers, independent contractors, and others who enter the workplace (i.e. "third parties"). Rose International's non-retaliation policy prohibits retaliatory conduct against employees who have engaged in protected conduct by any employee of the Company (including supervisors, managers, and co-workers of the above-listed persons) or by any third-party.

Rose International needs, expects and encourages you to come forward, without delay, should you suspect that any form of retaliation has occurred. Rose International takes all complaints regarding retaliation in the workplace seriously. Any employee who believes that they have been retaliated against should immediately report the conduct to Rose International's HR Department by calling (636) 812-4000 or e-mailing HR@roselT.com. Nothing in this policy is intended to interfere with legitimate employment decisions.

Retaliation will not be tolerated. Any employee, regardless of position or title, determined to be engaged in retaliation in violation of this policy, will be subject to disciplinary action, up to and including dismissal.