

Equal Employment Opportunity and Nondiscrimination

The Company is an equal opportunity employer and complies with all applicable federal, state, and local equal employment law practices. All employees are prohibited from engaging in unlawful discrimination, including persons involved in Company operations, supervisors, and coworkers. Victra prohibits unlawful discrimination against any job applicant, employee, or unpaid interns. This policy applies to all terms and conditions of employment, including but not limited to recruitment, hiring, evaluation, placement, transfer, promotion, discipline, training, compensation, benefits, and termination of employment. No employment decision is made, nor does the Company discriminate based on any characteristic protected by, federal, state or local law, including but not limited to race, color, age, religion (including religious dress and grooming practices), sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), gender (including gender identity, gender expression, and transgender), marital status, sexual orientation, sex stereotype, national origin, ancestry, citizenship, veteran status, physical or mental disability, military and veteran status, and genetic information. Victra also prohibits unlawful discrimination based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics. Victra also prohibits the failing to reasonably accommodate religious practices or qualified individuals with disabilities where the accommodation does not pose an undue hardship.

Pay discrimination between employees of the opposite sex or between employees of another race or ethnicity performing substantially similar work, as defined by state and federal law, is prohibited. Pay differentials may be valid in certain situations defined by law. Employees will not be retaliated against for inquiring about or discussing wages. However, the Company is not obligated to disclose the wages of other employees.

Disability Accommodations

Victra is committed to providing equal employment opportunities to qualified individuals with disabilities, including applicants, employees, and unpaid interns. This includes providing reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant, employee, or unpaid intern, unless the accommodation results in an undue hardship for the Company.

It is your responsibility to notify your supervisor and Human Resources of the need for a disability accommodation. If you have a disability and feel you may require an accommodation in order to perform the essential functions of your job, please discuss this need with Human Resources. Upon receipt of your request via a ticket submitted to Human Resources through Support Central, the Company will work with you confidentially to clarify your needs and to identify a reasonable accommodation.

Human Resources will ask you for your input on the type of accommodation you believe may be necessary and/or the functional limitations caused by your disability. Also, when appropriate, the Company may need your permission to obtain additional information from your physician or other medical or rehabilitation professionals. The Company will not seek genetic information in connection with requests for accommodation. All medical information received by the Company in connection with a request for accommodation will be treated as confidentially as possible.

Religious Accommodations

Victra is committed to providing equal employment opportunities to all individuals regardless of their religious beliefs or practices. Consistent with this commitment, Victra will provide a reasonable accommodation (including religious dress and grooming practices, such as religious clothing or hairstyles) of an applicant's, employee's, or unpaid intern's sincerely held religious belief if the accommodation would resolve a conflict between the individual's religious beliefs or practices and a work requirement, unless doing so would create an undue hardship for the business. If you need an accommodation because of your religious beliefs or practices, you should request an accommodation from Human Resources by submitting a ticket through Support Central. Victra may require relevant information such as your religion or religious belief, a description of the requested accommodation, the reason the accommodation is needed, and how the accommodation will help resolve the conflict between the religious belief or practice and the work requirement.

Bullying in the Workplace

Victra prohibits and will not tolerate bullying by an employee or customer in the workplace or at employer-sponsored events. Bullying is unwanted aggressive behavior that is threatening or intimidating and generally is repeated over time. It includes, but is not limited to, making threatening remarks (written or verbal), aggressive or hostile acts such as shouting, throwing objects at another person, aggressively intimidating another person (for example, using threatening body language or gestures such as shaking a fist toward the person), or behavior that may reasonably cause another person emotional distress. Should you feel that you are being bullied, please contact the HR Hotline at (919) 325-2160 or email SpeakUp@victra.com.

Workplace Harassment

Victra strictly prohibits harassment because of race, color, creed, religion, sex, national origin (including of undocumented individuals), ancestry, age, physical or mental disability, medical condition including genetic characteristics, or any information based on genetic background, family-care status, military and veteran status, citizenship status, immigration status, primary language, marital status, sexual orientation, gender identity or gender expression, sex stereotype, or any other consideration made unlawful by federal, state, or local or municipal laws. This also includes harassment based on a perception that a person has any of those characteristics or harassment of a person who is associated with a person who has or is perceived as having any of those characteristics.

"Gender expression" means a person's gender-related appearance or behavior, whether the appearance or behavior is stereotypically associated with the person's sex at birth. "Gender identity" means a person's identification as male, female, a gender different from the person's sex at birth, or transgender. "Because of sex" and "based on sex" includes, but is not limited to, pregnancy, childbirth, breastfeeding, and any related medical conditions, and gender identity and expression. "Sex Stereotype" means an assumption about a person's appearance or behavior, or about an individual's ability or inability to perform certain kinds of work based on a myth, social expectation, or generalization about the individual's sex. "Transgender" refers to a person whose gender identity differs from the person's sex at birth. A transgender person may or may not have a gender expression that is different from the social expectations of the sex assigned at birth. A transgender person may or may not identify as "transsexual."

All harassment based on the characteristics described above is unlawful and will not be tolerated. Victra is committed to taking all reasonable steps to prevent harassment from occurring. This Workplace Harassment policy applies to employees, vendors, customers, independent contractors, unpaid interns, volunteers, persons providing services pursuant to a contract, and other persons with whom you come into contact while working.

Prohibited Harassment Defined

Prohibited harassment because of a protected characteristic includes, but is not limited to:

- Verbal conduct such as epithets, derogatory comments, slurs, or unwanted sexual advances, invitations, or comments.
- Visual conduct such as derogatory posters, photography, cartoons, drawings, or gestures.
- Physical conduct such as unwanted touching, blocking normal movement, or interfering with work because of your sex or any other protected basis.
- Threats and demands to submit to sexual requests in order to keep your job or avoid some other loss or offers of job benefits in return for sexual favors.
- Retaliation for opposing, reporting, or threatening to report harassment, or for participating in an investigation, proceeding, or hearing conducted by an investigating agency.
- "Abusive conduct" is defined as insensitive verbal or physical conduct done for no legitimate business purpose.

The list above is illustrative only, and not exhaustive.

Sexual Harassment

Sexual harassment means harassment based on someone's sex or gender. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors, or any other conduct of a sexual nature, when any of the following is true: (1) submission to the conduct is made either an explicit or implicit condition of employment; (2) submission to or rejection of the conduct is used as the basis for an employment decision; or (3) the harassment has the effect of, or is carried out to sabotage, undermine, or interfere with, an employee's work performance, or creates an intimidating, hostile or offensive work environment. Harassment also includes the intentional or persistent failure to respect an individual's gender identity (for example, intentionally referring to the individual by a name or pronoun that does not correspond to the individual's gender identity).

Prohibited harassment is not necessarily limited to the loss of a job or some other economic benefit. Prohibited harassment that could result in impairing an employee's working ability or emotional well-being at work violates this policy and will not be tolerated.

Victra's Reporting Procedure

Our reporting procedure provides for an immediate, thorough and objective investigation of any harassment claim, appropriate disciplinary action against one found to have engaged in prohibited harassment, and appropriate remedies to an employee subject to harassment.

If you believe you have been harassed or discriminated against, or you are aware of the harassment of or discrimination against others, you should report it immediately to at least one of the following: (1) the HR Hotline (919-325-2160), (2) SpeakUp@victra.com, (3) a Human Resources representative, or (4) submission of a ticket in Vision. It is not sufficient to give notice only to your manager. The report should include details of the incident(s), names of individuals involved, the names of any witnesses, direct quotes when relevant, and any other documentary evidence (notes, pictures, messages, etc.). Any employee working in a supervisory role of any kind must report in accordance with this policy harassment, discrimination, or retaliation observed by or reported to the supervisor in at least one of the manners listed above.

All incidents of harassment that are reported will be investigated. Victra will protect the privacy and confidentiality of all parties involved to the extent possible consistent with a thorough investigation. If the Company determines that harassment has occurred, it will take remedial action commensurate with the circumstances. Appropriate action will also be taken to deter any future harassment. If a complaint of harassment is substantiated, appropriate disciplinary action, up to and including termination, will be taken.

Protection Against Retaliation for Reporting Harassment or Retaliation

The effectiveness of our efforts to enforce this policy against all forms of harassment depends largely on employees telling us about the harassment or retaliatory conduct. If employees feel that they or someone else may have been subjected to conduct that violates this policy, they should feel free to report it immediately. Additionally, any manager who observes harassment or retaliatory conduct must report the conduct to human resources so that an investigation can be made, and corrective action taken, if appropriate. Victra prohibits retaliation against any employee for reporting, filing, testifying, assisting, or participating in any manner in an investigation, proceeding, or hearing conducted by the Company or a federal or state enforcement agency. All reports of retaliation will be immediately, objectively, and thoroughly investigated in accordance with the investigation procedure outlined above. If a report of retaliation is substantiated, appropriate disciplinary action up to and including termination will be taken.

Violations of this Policy

Any employee, regardless of position or title, who is found to have engaged in harassment or retaliation in violation of this policy is subject to disciplinary action up to and including termination from employment.

Retaliation

Victra prohibits and does not tolerate retaliation against any employee, by any employee. All forms of retaliation are prohibited, including any form of discipline, reprisal, intimidation, or other form of retaliation for (1) participating in any activity protected by law, and (2) complaining about activities or conduct that violates the Company's Standards of Workplace Ethics. Examples of such protected activities include, but are not limited to, (i) lodging a good faith report with Human Resources that complains about harassment or pay, (ii) participating in an internal investigation into allegations of discrimination, (iii) requesting a disability or religious accommodation, (iv) filing a worker's compensation claim, (v) requesting or taking leave under the Family and Medical Leave Act, or (vi) complaining about another employee's unethical conduct in violation of the Standards of Workplace Ethics. Any employee, regardless of position or title, who engages in retaliation in violation of this policy will be subject to discipline up to and including termination.

If you believe you have been retaliated against, or you are aware of retaliation against others, you should report it immediately to at least one of the following: (1) the HR Hotline (919-325-2160), (2) SpeakUp@victra.com, (3) a Human Resources representative, or (4) submission of a ticket in Vision. It is not sufficient to submit the report only to your manager.