

I. Purpose:

The purpose of this document is to provide an overview of DAI's No Harassment Policy

II. Policy:

It is DAI's policy that all employees sign an agreement to adhere to the No Harassment Policy effective upon the date of hire.

III. Applicability:

This policy applies to all DAI Offices and Field Staff.

IV. Implementation Guidelines:

DAI's No Harassment Policy embodies the company's commitment to maintain a work environment where all employees feel respected and valued. This work environment is one free of all harassment based on sex, race, religion, color, national origin, ancestry, citizenship, age, physical or mental disability, pregnancy, childbirth or related medical condition, marital or veteran status, sexual orientation or any other basis protected by federal, state or local law, ordinance or regulation.

DAI's policy covers the behavior of all employees, board members, consultants and vendors hired by DAI and governs behavior in the work place, at company sponsored events or any other location where DAI business is conducted.

Harassment includes, but is not limited to, the following behavior:

- A. Verbal or written conduct (including emails) such as epithets, jokes or comments that are sexual in nature, sexist or derogatory, slurs or unwanted advances, invitations or comments;
- B. Visual conduct such as derogatory and/or sexually oriented screen savers, posters, photography, cartoons, drawing or gestures;
- C. Physical conduct such as assault, touching, restraining, blocking normal movement or any physical interference with work;
- D. Threats and demands to submit to certain non-work-related conduct or perform certain non-work activities;
- E. Retaliation by any of the above means for having reported, threatened to report or having assisted another employee to report harassment or discrimination.

Sexual harassment includes but is not limited to:

- A. unwelcome sexual advances;
- B. requests for sexual favors;
- C. and other verbal or physical conduct of a sexual nature.

And when:

- A. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment;
- B. Submission to such conduct is made either explicitly or implicitly a term or a condition of an individual's employment;

C. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual.

As a DAI employee, you are expected to prevent harassment by:

- A. Completing mandatory No Harassment training when assigned and on time;
- B. Treating others courteously and respectfully in all work relationships;
- C. Eliminating harassing conduct, unwanted touching or comments or actions that are sexual, sexist or otherwise discriminatory;
- D. Holding any activity involving employees, clients or the public at establishments which do not segregate memberships or limit participation on the basis of race, color, religion or sex;
- E. Entertaining employees or clients at establishments which do not feature “adult” entertainment;
- F. Reporting harassment to supervisors, management or Human Resources so that each complaint is investigated promptly and resolved equitably;
- G. Requesting training to learn to identify and prevent harassment.

Reporting Harassment Policy Violation

If you believe that you are being harassed, appropriately confront the offending individual and ask him/her to stop. If you are unable, uncomfortable or unsuccessful in confronting the offender (or the behavior continues), report the incident immediately.

Reporting Options

You are encouraged to talk to your direct supervisor first. If you are uncomfortable discussing the issue with your supervisor you can report the incident to one of the following:

- Human Resources by contacting either;
 - Senior Vice President of Human Resources
 - Any member of Human Resources Management Team
- DAI’s Chief Ethics and Compliance Officer (bottom of next section)
- Anonymous Hotline (next section)

Anonymous Hotline

Toll-Free for use within the United States – +1 855-603-6987

International Hotline & Website – <https://secure.ethicspoint.com/domain/media/en/gui/34333/index.html>

DAI has contracted with an outside firm, EthicsPoint, to provide a twenty-four (24) hour hotline to enable the anonymous reporting of fraud, compliance and harassment concerns. The international hotline listed above provides a platform for you to report any unethical conduct or harassment anonymously, through the internet, or over the phone. You will be asked a series of questions so that complete information can be communicated to the appropriate DAI official. To file a report within EthicsPoint, follow the instructions in the EthicsPoint Quick Reference Guide which can be found in the Governing Policy on Project Compliance below.

Alternatively, you may submit concerns or complaints directly to DAI's Chief Ethics and Compliance Officer in writing through e-mail, fax, or mail, or by calling directly. Please be advised that calling, faxing, and/or submitting electronic mail reports may not protect anonymity, depending on the systems used by the reporting party. For completely anonymous submission, the Hotline should be used.

Contact information is:

DAI Direct Mail, Telephone, Fax, and/or Electronic Mail:

Chief Ethics and Compliance Officer

DAI Global, LLC

7600 Wisconsin Avenue, Suite 200

Bethesda, MD 20814

Telephone: 1-301-771-7998

Confidential Fax: +1-240-823-2550

E-mail: Compliance@DAI.com

Reporting Responsibilities

Beyond reporting an incident of being harassed, **you also have an obligation to report any incident where you believe you have witnessed harassment or discrimination.**

If you are a **manager receiving a report** you must immediately contact a member of the Human Resources Management Team. Human Resources will undertake appropriate action for follow up on the complaint.

Note that giving false information regarding an investigation or a complaint is a violation of this policy and may result in disciplinary action, up to and including termination.

Consequences

If DAI determines a violation of DAI's No Harassment Policy has occurred, remedial action will be taken as appropriate. If you are reasonably believed by DAI to have engaged in harassment or discrimination you will be subject to disciplinary action up to and including termination.

Confidentiality

Confidentiality on all concerns or complaints submitted will be maintained to the fullest extent possible, consistent with existing laws and the need to conduct an adequate review. Confidentiality may not be possible due to the nature of certain complaints. In all cases, prompt and appropriate corrective actions will be taken if warranted.

Records relating to harassment complaints, investigations, and resolution are the property of DAI and will be maintained in a confidential manner with access allowed on a need-to-know basis or as otherwise determined necessary by Human Resources and/or DAI's General Counsel.

No Retaliation

DAI will not retaliate against any employee for filing a complaint and will not tolerate or permit retaliation by co-workers, consultants or vendors.

V. Authority:

The Senior Vice President of Human Resources is responsible for maintaining and updating DAI's No Harassment Policy.

VI. Related Topics and Links:

[International Hotline &](#)

[Website](https://secure.ethicspoint.com/domain/media/en/gui/34333/index.html) – <https://secure.ethicspoint.com/domain/media/en/gui/34333/index.html>