CICERO SUPPLY Mfg. & Supply Company, Inc.

Sexual Harassment Policy

Effective Date: June 8, 2026

1. STATEMENT OF POLICY

Sexual harassment is illegal under both the Illinois Human Rights Act and Title VII of the U.S. Civil Rights Act of 1964, as amended. Cicero Supply is firmly committed to maintaining a workplace free from all forms of sexual harassment and such conduct will not be tolerated. This policy applies to all employees, applicants for employment, supervisors, managers, contractors, vendors, and visitors.

Violations of this policy will result in disciplinary action up to and including immediate termination of employment.

2. DEFINITION OF SEXUAL HARASSMENT

According to the Illinois Human Rights Act, sexual harassment is defined as:

> Any unwelcome sexual advances, requests for sexual favors or any conduct of a sexual nature when:
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> 1. Submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment;
> 2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
> 3. Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

The courts have determined that sexual harassment is a form of discrimination under Title VII of the U.S. Civil Rights Act of 1964, as amended in 1991.

3. EXAMPLES OF SEXUAL HARASSMENT

Sexual harassment may take many forms. The following examples are illustrative, not exhaustive:

- Verbal: Sexual innuendos, suggestive comments, insults, humor, and jokes about sex, anatomy or gender-specific traits, sexual propositions, threats, repeated requests for dates, or statements about other employees of a sexual nature.
- Non-Verbal: Suggestive or insulting sounds (whistling), leering, obscene gestures, sexually suggestive bodily gestures, "catcalls", "smacking" or "kissing" noises.
- Visual: Posters, signs, pin-ups or slogans of a sexual nature, viewing pornographic material or websites.
- Physical: Touching, unwelcome hugging or kissing, pinching, brushing the body, any coerced sexual act, or actual assault.

- Textual/Electronic: "Sexting" (electronically sending messages with sexual content, including pictures and video), the use of sexually explicit language, harassment, cyberstalking, and threats via all forms of electronic communication (e-mail, text/picture/video messages, intranet/online postings, blogs, instant messages, and social network websites).

While the most commonly recognized forms of sexual harassment involve the conduct described above, non-sexual conduct can also constitute a violation of applicable law when that conduct is directed at a person because of his or her gender.

The most severe and overt forms of sexual harassment are easier to identify. On the other end of the spectrum, some sexual harassment is more subtle and depends, to some extent, on individual perception and interpretation. The courts assess sexual harassment by a standard of what would offend a "reasonable person." For this reason, every manager, supervisor, and employee must remember that seemingly "harmless" or subtle actions may lead to sexual harassment complaints.

Sexual harassment affects both genders. While it often involves a man's conduct directed at a woman, it can also involve a woman harassing a man, or harassment between members of the same gender.

4. RESPONSIBILITY OF INDIVIDUAL EMPLOYEES

Each individual employee has the responsibility to refrain from sexual harassment in the workplace. An employee who sexually harasses a fellow worker is liable for his or her individual conduct and will be subject to disciplinary action up to and including discharge, in accordance with company policy.

5. RESPONSIBILITY OF SUPERVISORY PERSONNEL

Each supervisor is responsible for maintaining a workplace free of sexual harassment. This is accomplished by promoting a professional environment and by addressing sexual harassment as with all other forms of employee misconduct. Supervisors are the first line of defense against sexual harassment — by setting the right example, a supervisor may discourage inappropriate behavior among employees.

Organizations and supervisors can be held liable for sexual harassment by a manager, supervisor, employee, or third party (such as a contractor, customer, or vendor). Recent U.S. Supreme Court decisions have made employer liability for supervisors' conduct even stricter. Supervisors must therefore understand that adherence to this policy is vitally important, both for maintaining a harassment-free environment and with regard to their own individual conduct.

Specifically, a supervisor who observes or receives a complaint of sexual harassment must:

- Address the incident with equal seriousness regardless of whether a formal complaint is made
- Report the incident promptly through appropriate channels
- Take prompt action to investigate and implement appropriate disciplinary measures
- Take all necessary steps to eliminate the harassment
- Maintain strict confidentiality throughout the process
- Ensure no retaliation occurs against an employee who makes a complaint

Supervisors should also regularly remind employees that incoming and outgoing electronic messages on company-owned equipment are subject to monitoring and that employees have no expectation of privacy on company-owned devices.

6. PROCEDURES FOR FILING A COMPLAINT

An employee who either observes or believes themselves to be the object of sexual harassment should deal with the incident as directly and firmly as possible by clearly communicating their objection to the offending employee. It is not necessary for sexual harassment to be directed at the person making a complaint.

Employees are encouraged to document each incident — what was said or done, the date, time, and place. Written records such as notes, memos, and messages can strengthen documentation.

All charges, including anonymous complaints, will be accepted and investigated regardless of how the matter comes to the attention of the company. No one making a complaint in good faith will be retaliated against, even if the complaint is not substantiated. Any witness will also be protected from retaliation.

Proper responses to conduct believed to be sexual harassment may include the following steps:

Step 1 — Direct Communication

If there is sexual harassing behavior in the workplace, the affected employee should directly and clearly express their objection that the conduct is unwelcome and request that the offending behavior stop. The initial communication may be verbal. If the behavior continues, subsequent communications should be put in writing (note or memo).

Step 2 — Contact with Supervisory Personnel

At the same time direct communication is undertaken, or if the employee feels threatened or intimidated, the problem must be promptly reported to the immediate supervisor. If the harasser is the immediate supervisor, the problem should be reported to the next level of supervision.

Step 3 — Formal Written Complaint

An employee may also report incidents of sexual harassment directly to Laura Hixson - Key Accounts Manager: That contact will counsel the reporting employee and assist with filing a formal complaint. Cicero Supply will fully investigate the complaint and advise the complainant and the alleged harasser of the results of the investigation.

Step 4 — Resolution Outside the Company

An employee has the right to contact the Illinois Department of Human Rights (IDHR) or the Equal Employment Opportunity Commission (EEOC) about filing a formal complaint. An IDHR complaint must be filed within 180 days of the alleged incident(s), unless it is a continuing offense. An EEOC complaint must be filed within 300 days. An appeal process is also available through the Illinois Human Rights Commission (IHRC) after the IDHR has completed its investigation.

Note: Where an employer has an effective sexual harassment policy in place and a complaining employee fails to use it and allow the employer an opportunity to address the problem, that employee may, in certain cases, lose the right to further pursue the claim against the employer.

Disciplinary Penalties

If an investigation substantiates a complaint, Cicero Supply will take prompt corrective action. Penalties may include, but are not limited to:

- Verbal or written warning
- Mandatory sexual harassment prevention training
- Reassignment, demotion, or transfer
- Suspension with or without pay
- Termination of employment

False and Frivolous Complaints

False and frivolous charges — where a complaint is used to accomplish some end other than stopping sexual harassment — are a serious offense. This does not refer to charges made in good faith that cannot be proven. Given the severity of consequences for the accused, a knowingly false complaint may itself result in disciplinary action.

7. LEGAL RECOURSE — IDHR AND IHRC

In addition to Cicero Supply's internal complaint process, employees and applicants have the right to file a complaint with the following agencies:

Illinois Department of Human Rights (IDHR)

The IDHR investigates charges of sexual harassment under the Illinois Human Rights Act. A complaint must be filed within 180 days of the alleged incident(s), unless it is a continuing offense.

Illinois Human Rights Commission (IHRC)

After the IDHR completes its investigation, an appeal process is available through the IHRC, an independent quasi-judicial body that adjudicates human rights complaints in Illinois.

U.S. Equal Employment Opportunity Commission (EEOC)

Employees also have the right to file a charge with the EEOC under federal law. An EEOC complaint must be filed within 300 days of the alleged incident(s).

8. CONTACT INFORMATION

Illinois Department of Human Rights (IDHR)

- Chicago: (312) 814-6200 or (800) 662-3942 | Chicago TTY: (866) 740-3953
- Springfield: (217) 785-5100 | Springfield TTY: (866) 740-3953
- Marion: (618) 993-7463 | Marion TTY: (866) 740-3953
- Website: www2.illinois.gov/dhr

Illinois Human Rights Commission (IHRC)

- Chicago: (312) 814-6269 | Chicago TTY: (312) 814-4760
- Springfield: (217) 785-4350 | Springfield TTY: (217) 557-1500

- Website: www2.illinois.gov/ihrc

U.S. Equal Employment Opportunity Commission (EEOC)

- Chicago: (800) 669-4000 | Chicago TTY: (800) 869-8001
- Website: www.eeoc.gov

9. PROTECTION AGAINST RETALIATION

Retaliation against any person who, in good faith, reports sexual harassment, files a charge or complaint, participates in an investigation, or opposes any unlawful practice is strictly prohibited and is itself a violation of the Illinois Human Rights Act.

Under Section 6-101 of the Illinois Human Rights Act, it is a civil rights violation to retaliate against any person because they have:

- Opposed a practice believed to constitute sexual harassment or another violation of the Illinois Human Rights Act
- Filed a charge, complaint, or grievance under the Illinois Human Rights Act
- Testified, assisted, or participated in any investigation, proceeding, or hearing under the Act

An employee who is transferred to a lower-paying position, passed over for promotion, or otherwise adversely affected after filing a complaint may file a retaliation charge with the IDHR (within 180 days) or the EEOC (within 300 days) of the alleged retaliation.

Any employee found to have engaged in retaliation will be subject to disciplinary action up to and including immediate termination. Employees who believe they have experienced retaliation should report it using the internal complaint procedures described in Section 6 of this policy.

No one making a complaint in good faith will be retaliated against, even if the complaint is not substantiated. Any witness will also be protected from retaliation.

DISCLAIMER: This policy is adapted from the Illinois Governor's Office Model Policy (Executive Order No. 16, 1999) and is provided for informational purposes only. It does not constitute legal advice. Cicero Supply recommends that this policy be reviewed by a licensed attorney to ensure compliance with applicable federal, state, and local laws. This policy should be reviewed and updated periodically as laws change.