**POLICY ON HARASSMENT AND REPORTING HARASSING CONDUCT**

POLICY AGAINST HARASSMENT

North American is committed to providing a work environment free of harassment. The Company policy prohibits sexual harassment, and harassment based on race, religious belief, color, sex, pregnancy, childbirth or related medical conditions, age, national origin, ancestry, sexual orientation, gender identification, physical or mental disability, medical condition, genetic characteristics, family care, marital status, status as a veteran or qualified disabled veteran, or any basis protected by federal, state, or local law or ordinance or regulation. The Company’s anti-harassment policy applies to all persons involved in the operation of the Company and prohibits harassment by any employee or independent contractor of the Company, as well as outside persons having contact with the Company’s employees (this includes our customers and potential customers, vendors, delivery persons, etc.)

This policy is intended to serve as a workplace rule that sets the standard of expected behavior for all employees and various third parties while in the workplace. The Company will not tolerate harassment or discrimination of any kind, either against co-workers, independent contractors, customers, or any other outside person(s) having contact with the Company.

Harassment includes verbal, physical and visual conduct where:

(1) Submission to the conduct is made either an explicit or implicit condition of employment or of the business, service or professional relationship.

(2) Submission to or rejection of the conduct used as a basis for an employment decision or decision affecting the terms of business, service or professional relationship.

(3) The harassment interferes with the work performance or creates an intimidating, hostile, or offensive work environment. It can take many forms and includes, but is not limited to, the following: slurs, jokes, statements, email messages, gestures, assault, impeding or blocking another’s movement or otherwise physically interfering with normal work, pictures, drawings or cartoons based upon race, religious belief, color, sex, pregnancy, childbirth or related medical conditions, age, national origin, ancestry, sexual orientation, gender identification, physical or mental disability, medical condition, family care, marital status, status as a veteran or qualified disabled veteran, or any other basis protected by law; or

(4) Retaliation is taken against an individual for reporting or threatening to report sexual harassment.

Sexual harassment, in particular, refers to all of the prohibited conduct described above, as well as unwelcome conduct such as requests for sexual favors, conversation containing sexual comments and other unwelcome sexual advances. Sexually harassing conduct includes any prohibited conduct performed by a person of either the same sex or opposite sex as the person who is the subject of harassment.

REPORTING HARASSING CONDUCT TO THE COMPANY

If you believe you have been harassed or have witnessed an incident of harassment, submit an oral or written complaint to Sherry Tate, Recruiting Manager, as soon as possible after the incident.

Your complaint should include details of the incident, or incidents, names of the individual involved, and names of any witnesses. The Company will promptly undertake a thorough and objective investigation of the harassment allegations.

It is the obligation of all employees to cooperate fully in the investigation process. Disciplinary action will be taken against any employee who attempts to discourage or prevent any harassment victim from using the Company’s complaint procedure to report harassing conduct.

If it is determined that harassment has occurred, remedial action will be taken in accordance with the circumstances involved. Any employee determined by the Company to be responsible for harassment will be subject to appropriate disciplinary action, up to and including termination. A Company representative will advise all parties concerned of the general results of the investigation. The Company will not retaliate against you for filing a complaint and will not tolerate or permit retaliation by management, employees , or co-workers.

The Company encourages you to immediately report any incidents of harassment or retaliation forbidden by this policy so that complaints can be quickly and fairly resolved. You also should be aware that the federal Equal Employment Opportunity Commission and the California Department of Fair Employment and Housing investigate and prosecute complaints of prohibited harassment and retaliation in employment. If you think you have been harassed or that you have been retaliated against for resisting or complaining you may file a complaint with the appropriate agency. The nearest agency office is listed in the telephone book.