

Discrimination and Harassment

Policy

1. Purpose:

The purpose of this writing is to define the requirements for assessing and responding to discrimination and harassment at Spirit.

2. Scope:

This is applicable to all Spirit locations and Equal Employment Opportunity. This policy is governed by the requirements of each country's national and local laws.

3. Requirements Detail:

Spirit is committed to fostering a culture that is free of discrimination and harassment and where all employees are treated with dignity and respect.

Discrimination and/or harassment not only violates Spirit's core operating values, but in many cases is a violation of the law.

Spirit has a zero tolerance policy regarding discrimination and/or harassment and will administer discipline when it is determined that conduct in violation of this policy has occurred.

Spirit is committed to ensuring equal employment opportunity without discrimination on the basis of race, color, religion or belief, national origin, sex, pregnancy, marital or civil partnership status, age, disability, veteran status, sexual orientation, gender identity, genetic information, each as recognized by the applicable law(s) or any other characteristic protected by law (each a Protected Class). Spirit further prohibits harassment, as recognized by law, on the basis of Protected Class. This policy does not constitute a contract or contractual obligation, and the Company reserves the right, in its sole discretion, to amend, modify, or discontinue its use without prior notice, notwithstanding any person's acts, omissions or statements to the contrary.

3.1 Retaliation

Spirit encourages raising concerns of discrimination and/or harassment in good faith without fear of retaliation. The company strictly prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

Any individual who believes they have been subject to retaliation should follow the reporting procedure for their site.

3.2 Discrimination

Discrimination occurs when a distinction is made in favor of or against a person on the basis of the group or class to which the person belongs.

3.3 Harassment

Harassment can take many forms, but is most commonly verbal or physical conduct based on his or her Protected Class, that unreasonably interferes with an individual's work performance or creates an intimidating or offensive work environment.

Harassment encompasses a wide range of conduct; examples include but are not limited to:

- Threats, epithets, derogatory comments or slurs
- Derogatory posters, photographs, cartoons, drawing or gestures
- Assault, unwanted touching, or blocking someone's movement

3.4 Sexual Harassment

Sexual harassment is defined as offensive or persistent unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature.

Sexual Harassment encompasses a wide range of conduct; examples include but are not limited to:

- Conduct of a sexual nature is made, either explicitly or implicitly, a term or condition of an individual's employment.
- When whether an employee submits to or rejects a sexual request by a superior is used for the basis of employment decisions.
- Conduct of a sexual nature that has the purpose of unreasonably interfering with an individual's work performance.
- Conduct of a sexual nature that creates an intimidating or offensive work environment.

4. Functional Organization(s) and Responsibilities:

The Global Process Owner has the responsibility for ensuring compliance with this writing.

4.1 Human Resources – Legal – EEO/Corporate Compliance

4.1.1 Monitors and ensures compliance with this policy. This includes investigating complaints and taking appropriate action.

4.1.2 Works with managers and employees to prevent discrimination, harassment and/or retaliation.

4.2 Managers

4.2.1 Treats all employees with dignity & respect.

4.2.2 Encourages employee to come forward with complaints of inappropriate conduct.

4.2.3 Identifies, addresses and/or elevates concerns regarding discrimination, harassment or retaliation.

4.3 Employees

4.3.1 Behaves respectfully, challenges disrespectful behavior and reports incidents immediately.
