

Violence-Free Workplace (Revised: 3/30/2010)

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Overview

Maintaining a safe and secure work environment for all employees is a priority at Huron. To keep our workplace a safe and desirable one, Huron maintains a Violence-Free Workplace Policy. Acts or threats of physical violence, including intimidation, harassment and/or coercion, which involve or affect the Company, or which occur on Company property, will not be tolerated.

Coverage

This prohibition against threats and acts of violence applies to all persons involved in the operation of the Company, including, but not limited to, Huron officers, managers, supervisors, employees, customers, clients and suppliers.

Definition: Workplace Violence

Workplace violence is any intentional conduct that is sufficiently severe, offensive or intimidating to cause an individual to reasonably fear for his or her personal safety or the safety of his or her family, friends and/or property such that employment conditions are altered or a hostile, abusive or intimidating work environment is created for one or several Huron employees.

Expected Behavior

All employees are expected to treat coworkers, managers, customers, and all other contacts in the workplace in a mature and professional way.

No Tolerance

Under no circumstances will violence, threatening behavior, unwarranted pursuit, or harassment be tolerated. Such acts will be thoroughly investigated and appropriate action will be taken, including disciplinary action, termination, banning from the premises and/or the filing of criminal charges with law enforcement authorities.

Examples of Workplace Violence

Examples of workplace violence include, but are not limited to, the following:

- Threats or acts of violence occurring on company premises, regardless of the relationship between the company and the parties involved in the incident;
- Threats or acts of violence occurring off company premises involving someone who is acting in the capacity of a representative of Huron;

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Examples of Workplace Violence (continued)

- Threats or acts of violence occurring off company premises involving an employee of the company if the threats or acts affect the business interests of Huron;
- Threats or acts of violence occurring off company premises of which an employee of the company is a victim if the company determines that the incident may lead to an incident of violence on company premises;
- Threats or acts resulting in the conviction of an employee or agent of Huron or of an individual performing services for Huron on a contract or temporary basis, under any criminal code provision relating to violence or threats of violence which adversely affect the legitimate business interests of Huron.
- Harassing or threatening phone calls.
- Surveillance
- Stalking
- Veiled threats of physical harm or similar intimidation.
- Communicating an endorsement of the inappropriate use of firearms or weapons of any kind.
- Possessing weapons of any type, whether licensed or not, and particularly firearms within the work environment. Weapons, include, but are not limited to:
 - any firearm, loaded or unloaded, assembled or disassembled, including pellet, "BB" and stun guns;
 - knives (and other similar instruments) other than those present in the workplace for approved work purposes or for the specific purpose of food preparation and service;
 - o any switchblade knife;
 - o brass knuckles, metal knuckles, and similar weapons;
 - o bows, cross-bows and arrows;
 - explosives and explosive devices, including fireworks, ammunition and/or incendiary devices;
 - throwing stars, nun-chucks, clubs, saps, and any other item commonly used as, or primarily intended for use as a weapon;
 - self-defense chemical sprays (mace, pepper spray) in canisters or containers larger than two ounces;
 - any object that has been modified to serve as, or has been employed as, a dangerous weapon



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Reporting Procedure

In the event that an employee believes that a threat or act of violence has been made against that employee or others, the employee should report the details immediately to his/her Supervisor or Human Resources Business Partner.

Failure to report any threats or acts of violence in violation of this policy is itself a violation of this policy, and may subject any employees involved to discipline, up to and including discharge.

Retaliation against anyone for reporting an actual or suspected violation of this policy in good faith will not be tolerated and will subject the individual engaging in the retaliation to discipline, up to and including termination. Any complaints about retaliation may be reported in the same manner as violations of this policy are to be reported.

Employee Responsibility

Remember, each of us is responsible for reporting any situation that could result in harm to someone in the workplace.

Under this policy, decisions may be needed to prevent a threat from being carried out, a violent act from occurring, or a life-threatening situation from developing. No existing Company policy or procedure should be interpreted in a manner that prevents the above from occurring. Huron will make the sole determination of whether, and to what extent, threats or acts of violence will be acted upon by the Company. In making this determination, Huron will undertake a case-by-case analysis of facts in order to ascertain whether there is a reasonable basis to believe that workplace violence has occurred. No provision of this policy shall alter the at will nature of employment at Huron. No provision of this policy is intended to create any obligations beyond those required by existing law.