



Sexual Harassment Policy

It is the goal of Summit to promote a workplace that is free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by this organization. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. To achieve our goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees.

Because Summit takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

The legal definition for sexual harassment is this:

“sexual harassment” means sexual advances, requests for sexual favors and verbal or physical conduct of a sexual nature when:

- submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions;

or,

- such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual’s work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a work place environment that is hostile, offensive, intimidating or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances - whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences; and,
- Discussion of one's sexual activities.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this organization.

If any of our employees believes that he or she has been subjected to sexual harassment, the employee has the right to file a complaint with our organization. This may be done in writing or orally.

If you would like to file a complaint you may do so by contacting:

Melissa Kopsack
Employee Relations Director
Summit Technical Services, Inc
Corporate Office
355 Centerville Road
Warwick, RI 02886

Ms. Kopsack is also available to discuss any concerns you may have and to provide information to you about our policy on sexual harassment and our complaint process.

When we receive a complaint we will promptly investigate the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation will include a private interview with the person filing the complaint and with witnesses. We will also interview the person alleged to have committed sexual harassment. When we have completed our investigation, we will, to the extent appropriate inform the person

filing the complaint and the person alleged to have committed the conduct of the results of that investigation. If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate we will also impose disciplinary action.

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment, and may include such other forms of disciplinary action as we deem appropriate under the circumstances.

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short-term period for filing a claim (EEOC – 180 days; MCAD – 6 months).

The United States Equal Employment
Opportunity Commission (“EEOC”)
One Congress Street – 10th Floor
Boston, MA 02114
617-565-3200

The Massachusetts Commission
Against Discrimination (“MCAD”)
One Ashburton Place – Rm. 601
Boston, MA 02108
617-727-3990



Electronic Communications Policy

Computers, computer files, telephone systems, Internet, e-mail and voice-mail access is intended for Summit use only. The Company encourages the use of the computer and telephone system with its Internet, e-mail and voice-mail access because it makes communication more efficient and effective. However, the computer and telephone system with its Internet, e-mail and voice-mail access is Company property, and its purpose is to facilitate the Company's public image. Employees are required to use the computer and telephone system with its Internet, e-mail and voice-mail access in a productive businesslike manner. To ensure that all employees are responsible, the following guidelines have been established for using the computer and telephone system with its Internet, e-mail and voice-mail access. Any improper use of the computer and telephone system with its Internet, e-mail and voice-mail access is not acceptable, will not be permitted, and will be subject to disciplinary action, up to and including termination of employment.

E-mail networks and voice-mail shall not be used to solicit for outside business ventures, organizational campaigns, political or religious causes. Any use of such equipment for inappropriate or offensive messages is prohibited. The policy is also violated when users break into confidential files or otherwise abuse the privilege of computer access.

The Company computer and telephone system with its Internet, e-mail and voice-mail access may not be used for transmitting, retrieving or storage of any communications of a discriminatory or harassing nature or materials that are obscene or x-rated. Harassment of any kind is prohibited. No messages with derogatory or inflammatory remarks about an individual's race, age, disability, religion, national origin, physical attributes or sexual preference shall be transmitted. No abusive, profane or offensive language is to be transmitted through the Company's computer and telephone system with its Internet, e-mail and voice-mail access. Electronic media may also not be used for any other purpose that is illegal, against Company policy or contrary to the Company's best interest. Solicitation of non-Company business or any use of the Company's computer and telephone system with its Internet, e-mail and voice-mail access for personal gain, is prohibited. Employees should not use the Company's computer systems that would be disruptive, offensive to others or harmful to morale.

Employees are also prohibited from accessing, distributing or publishing through the use of Company equipment, trade secrets or proprietary information of the Company without proper authorization. In addition, all employees are prohibited from downloading,

viewing, transmitting and/or possessing pornographic, profane, sexually explicit, or racially offensive materials from Company equipment or systems.

Summit purchases and licenses the use of various computer software for business purposes and does not own the copyright to software or its related documentation. Unless authorized by the software developer, no employee should load or reproduce copies of software packages on more than one computer. If employees become aware of any software or licensing violations, they should immediately report such unauthorized use in a signed writing to the Summit MIS Director. Downloading and/or installing software, registered trademarks or copyrighted images that were not provided or authorized by Summit is prohibited and is a serious matter.

Each employee is responsible for the content of all text, audio or images that he/she places or sends over the Company's computer and telephone system along with its Internet, e-mail and voice-mail access. No e-mail or other electronic communications may be sent which hides the identity to the sender, or represents the sender as someone else or someone from another company. All messages communicated on the Company's computer and telephone system with its Internet, e-mail and voice-mail access must contain the employee's name.

To prevent computer viruses from being transmitted through the Company's Internet and e-mail system, there will be no unauthorized downloading of any unauthorized software. All software downloaded or loaded from a disc onto a computer must be registered to the Company. Employees should contact the MIS Director if they have any questions.

The Company reserves the right to access and monitor all messages and files on the Company's e-mail/Internet and voice-mail system. Employees should not assume electronic communications are private and should transmit personal or confidential data in other ways. Electronic communications are subject to search without notice. Summit reserves these rights so that it can enforce this policy and so that the systems described in this section are used in a productive and non-threatening manner.

Employees who violate this policy are subject to discipline up to and including termination from employment, depending upon the seriousness of the offense in the judgment of management. All employees will be required to sign a form acknowledging their understanding this policy. The Company also reserves the right to advise appropriate legal officials of any illegal violations.

Sexual Harassment/E-Communication Policy

Acknowledgement

My signature below is my acknowledgement of having received a copy of the Summit Technical Services' Sexual Harassment/E-Communication Policy. I completely understand and agree to comply with all of the guidelines listed therein. I understand that the Summit Technical Services' Sexual Harassment/E-Communication Policy is in place at the client's work site or while on client business. In addition, I am expected to comply with any sexual harassment and/or e-mail policies set forth by the client company.

Employee Signature

Date

Summit Technical Services, Inc Representative

Date