



Unlawful Harassment Policy

OfficeWorks, Inc. (the Company) is committed to providing a work environment free of unlawful harassment. Company policy prohibits sexual harassment and harassment based on pregnancy, childbirth or related medical conditions, race, religious creed, color, gender, national origin or ancestry, physical or mental disability, medical condition, marital status, registered domestic partner status, age, sexual orientation or any other basis protected by federal, state or local law or ordinance or regulation. *All such harassment is unlawful.* The Company's anti-harassment policy applies to all persons involved in the operation of the Company and prohibits unlawful harassment by any employee of the Company, including supervisors and managers, as well as vendors, customers and any other persons. It also prohibits unlawful harassment based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics.

Prohibited unlawful harassment includes, but is not limited to, the following behavior:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations or comments;
- Visual displays such as derogatory and/or sexually-oriented posters, photography, cartoons, drawings or gestures;
- Physical conduct including assault, unwanted touching, intentionally blocking normal movement or interfering with work because of sex, race or any other protected basis;
- Threats and demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss and offers of employment benefits in return for sexual favors; and
- Retaliation for reporting or threatening to report harassment.

If you believe that you have been unlawfully harassed, submit a written complaint to your own or any other Company supervisor, the president or the personnel administrator of the Company as soon as possible after the incident. You will be asked to provide details of the incident or incidents, names of individuals involved and names of any witnesses. Supervisors will refer all harassment complaints to the personnel administrator, investigative officer or the president of the Company. The Company will immediately undertake an effective, thorough and objective investigation of the harassment allegations.

If the Company determines that unlawful harassment has occurred, effective remedial action will be taken in accordance with the circumstances involved. Any employee determined by the Company to be responsible for unlawful harassment will be subject to appropriate disciplinary action, up to, and including termination. A Company representative will advise all parties concerned of the 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 all employees to report any incidents of harassment forbidden by this policy *immediately* 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 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 office is listed in the telephone book.



To: All Employees

Subject: Harassment - Complaint Procedure

As your employer, OfficeWorks, Inc. (the Company) has adopted a firm policy against harassment. We will take every reasonable step to prevent harassment from occurring. However, if you believe that you have been unlawfully harassed, we urge you to report the incident immediately so that your complaint can be resolved quickly and fairly.

1. When possible, confront the harasser and persuade him/her to stop.
2. Provide a written or oral complaint to your own supervisor or to any other Company supervisor, the president, or a human resources representative of the Company as soon as possible after the incident. Include all details on the incident(s), names of individuals involved, and the names of any witnesses.
3. Supervisors will refer all harassment complaints to the human resources representative, investigative officer, or the president of the Company. The Company will immediately undertake an effective, thorough, and objective investigation of the harassment allegations.
4. If the Company determines that unlawful harassment has occurred, it will take effective remedial action in accordance with the circumstances. Any employee the company determines to be responsible for unlawful harassment will be subject to appropriate disciplinary action, up to and including termination.
5. The Company will take appropriate action to remedy any loss to you resulting from harassment.
6. The Company will not retaliate against you for filing a complaint and will not tolerate or permit retaliation by management, employees, or co-workers.

For the procedure for filing complaints, please contact:

Human Resources

Office Works, Inc.
18801 Ventura Blvd. Suite 205
Tarzana, CA 91356

Tel: 888-256-9257
Fax: 818-975-5064
Email: csr@owrx.com