

KODAK ALARIS INC. EQUAL OPPORTUNITY EMPLOYMENT POLICY (EOE)

1.1 Equal Opportunity

The Company is committed to providing a work environment that is free from unlawful discrimination and harassment in any form. It is the Company's policy to comply with all applicable laws that provide equal opportunity in employment for all persons and to prohibit unlawful discrimination in employment. The Company's policy is not to discriminate by reason of race, color, religion, sex/gender, gender identity, sexual orientation, marital status, pregnancy, genetic information, citizenship status, national origin, age, disability, veteran status or any other status protected by applicable federal, state, or local law. In addition, in each country in which it operates, the Company will comply with all applicable laws prohibiting employment discrimination based on any other factor.

The Company will make reasonable accommodations for qualified individuals with disabilities unless doing so would result in an undue hardship. Persons with disabilities who are in need of accommodation are encouraged to discuss their needs with Human Resources.

This policy applies to all terms and conditions of employment including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, and training.

1.2 Policy Against Unlawful Discrimination/Harassment

The Company insists that all individuals be treated with respect and dignity. Each individual should be able to work in a professional atmosphere that promotes teamwork and attainment of the Company's goals. Improper interference with the ability of the Company's employees to perform their expected job duties is unacceptable and unprofessional. The Company expressly prohibits any form of unlawful discrimination, unlawful harassment, and any other inappropriate or unprofessional conduct and will not tolerate, condone, or allow such conduct by fellow employees, supervisors, managers, customers, vendors, contractors, visitors, or others who conduct the Company's business. The Company's "work environment" extends to all Company facilities and any setting outside the workplace where individuals who work with or for the Company are gathered, such as business trips, customer-site visits, conferences, and social events.

1.2.1 Workplace Discrimination and Harassment

Prohibited conduct can be defined to include but not limited to: racially or ethnically offensive hostile or intimidating conduct either verbal or physical, conduct with racial or ethnic content or overtones which is severe, pervasive or persistent may be considered racial/ethnic harassment, assigning persons to an isolated or separate work area based on their race or ethnicity; basing overtime assignments on race or ethnicity and harassment that may target persons because of their color, religion, sexual orientation, gender, marital status, pregnancy, genetic information, citizenship status, national origin, age, disability, veteran status, or other factors.

1.2.2 Sexual Harassment

The purpose of this policy statement on sexual harassment is to establish clearly and unequivocally that the Company prohibits sexual harassment by and of its employees. No employee, either male or female, should be subjected to unsolicited or unwelcome sexual advances or conduct either verbal or physical.

"Sexual harassment" has been defined by government agencies and the courts as conduct which includes all unwelcome sexual advances, requests for sexual favors, and all other verbal or physical conduct of a sexual nature when:

- a. Submission to such conduct is made either explicitly or implicitly a term or condition of employment;
- b. Submission to, or rejection of, such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- c. Such conduct is sufficiently severe or pervasive to alter the conditions of employment and to create a hostile or abusive working environment.

Sexual harassment may take many forms, including, but not limited to: verbal teasing or abuse of a sexual nature; inquiries about sexual activities, sexual orientation and gender identity; subtle pressure or abuse of a sexual nature; inappropriate, unwelcome and unnecessary touching of an individual, for example, grabbing, patting, pinching, hugging, repeatedly brushing against another employee's body or impeding the movement of another person; offensive sexual flirtation, advances, or propositioning, including suggestive looks or gestures; sexually graphic verbal commentaries or jokes made in any medium; sexually degrading words used to describe an individual; or the offensive display in the workplace of sexual or pornographic objects, pictures or writings.

Unlawful sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

1.2.3 Contractors and Vendors

Contractors, vendors and others who have a business relationship with the Company are responsible for the rules of conduct expressed in the Policy while doing business at or on behalf of the Company. This will require that all employees of Company suppliers are familiar and acknowledge understanding of Company policy. Failure to comply with Company policy could result in termination of future business.

1.2.4 Complaint Procedure

Employees should ***immediately*** report all incidents of discrimination, harassment (sexual or otherwise) or retaliation, regardless of the offender's identity or position. Such reports or complaints may be directed to the individual's supervisor, manager, or Human Resources. **An employee is not required to report an incident of discrimination or harassment to an individual whom the employee believes has violated this policy.**

It shall be the responsibility of all Company employees to ensure that their behavior and environment are maintained free of discrimination or harassment. A supervisor or member of management who believes that he or she has witnessed conduct prohibited by this policy must ***immediately*** contact the Company's Senior Management and Human Resources Organization. Each supervisor shall have the responsibility to promote a non-threatening environment, which includes discussing this policy with all employees and assuring them that they are not required to endure insulting, degrading, or exploitative treatment.

Reports of sexual harassment may be made verbally or in writing. A form for submission of a written complaint is attached to this Policy, and all employees are encouraged to use this complaint form. Employees who are reporting sexual harassment on behalf of other employees should use the complaint form and note that it is on another employee's behalf.

Employee's may also report allegations of sexual harassment or other conduct prohibited by this policy through the Company's Ethic's hotline: <http://www.kodakalaris.ethicspoint.com>

Employees, paid or unpaid interns or non-employees who believe they have been a target of sexual harassment may also seek assistance in other available forums, as explained below in the section on Legal Protections.

All reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include interviews with the parties involved and, where necessary, with individuals who

may have observed the alleged conduct or may have other relevant knowledge. Depending upon the circumstances, the Company may request that written statements be provided.

Reasonable efforts will be made to maintain confidentiality, although the employee reporting such conduct must be aware that the Company will conduct an investigation with the person(s) alleged to be involved. All investigations regarding discrimination and/or harassment will be conducted with reasonable discretion but still allow the facts to be obtained.

Violations of this policy will be dealt with appropriately. Appropriate corrective action will be determined by the Company based upon all of the relevant facts and circumstances, and may include training, referral to counseling, written warning, suspension without pay or termination.

1.2.5 Retaliation

The Company encourages employees to report all perceived incidents of discrimination or harassment (sexual or otherwise) without fear of retaliation or reprisals. The Company will immediately investigate any complaint of retaliation.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action (without regard to the underlying facts related to the initial complaint). Acts of retaliation should be reported immediately and will be promptly investigated and addressed as a separate violation of this policy

Such retaliation is unlawful under federal, state, and (where applicable) local law. The New York State Human Rights Law protects any individual who has engaged in "protected activity." Protected activity occurs when a person has:

- made a complaint of sexual harassment, either internally or with any anti-discrimination agency;
- testified or assisted in a proceeding involving sexual harassment under the Human Rights Law or other anti-discrimination law;
- opposed sexual harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment;
- reported that another employee has been sexually harassed; or
- encouraged a fellow employee to report harassment.

Even if the alleged harassment does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith belief that the practices were unlawful. However, the retaliation provision is not intended to protect persons making intentionally false charges of harassment.

1.3 Legal Protections and External Remedies

Sexual harassment is not only prohibited by Kodak Alaris Inc. but is also prohibited by state, federal, and, where applicable, local law.

Aside from the internal process at Kodak Alaris Inc., employees may also choose to pursue legal remedies with the following governmental entities. While a private attorney is not required to file a complaint with a governmental agency, you may seek the legal advice of an attorney.

State Human Rights Law (HRL)

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State with regard to sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court.

Complaints with DHR may be filed any time **within one year** of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL, **within three years** of the alleged sexual harassment. An individual may not file with DHR if they have already filed a HRL complaint in state court.

Complaining internally to Kodak Alaris does not extend your time to file with DHR or in court. The one year or three years is counted from date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney's fees and civil fines.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: www.dhr.ny.gov.

Contact DHR at (888) 392-3644 or visit dhr.ny.gov/complaint for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

Civil Rights Act of 1964

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief, but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

An employee alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at www.eeoc.gov or via email at info@eeoc.gov.

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit www.nyc.gov/html/cchr/html/home/home.shtml.

Contact the Local Police Department

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

EQUAL OPPORTUNITY EMPLOYMENT (EOE) COMPLAINT/CONCERN INCIDENT REPORT (CIR)

CONFIDENTIAL

*An initial EOE Incident Report must be started within **24 hours of notice** of a complaint/concern. The Protocol timeframe for investigations is **10-30 days**. When the investigation and disposition are completed, a final updated EOE Complaint/Concern Incident Report must be submitted.*

INITIAL FINAL

Date of complaint/concern receipt*:

Date of Report:

*Enter date Supervisor or HR first received notice

Person Completing Report:

INDIVIDUAL REPORTING THE CONCERN/INCIDENT

Name:

Global ID:

Check the appropriate box.

Alleged Victim – Employee Alleged Victim – Non-Employee Employee Witness Non-KodakAlaris Witness

Gender: Female Male

Race:

Organization:

Name of Supervisor of Individual Reporting Incident:

Work Location of Individual Reporting Incident: (e.g. Rochester/KAC/Field/Other):

Department Manager:

Division Manager:

HR Manager:

ALLEGED EOE CONCERN/INCIDENT

Date of alleged incidents (s):

Time and location of alleged incident(s) (Bldg., Floor, work area, etc)

Name(s) of Witness to alleged incident (s):

Name(s) of Alleged Accused/Doer:

Brief Summary of Incident:

Was this same incident reported previously? Yes No

IF YES Date incident reported:

Person(s) to whom reported:

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CONFIDENTIAL

NOTIFICATIONS

IMPORTANT: Notifications must be made to all individuals listed **within 24 hours** of complaint/concern receipt. **Legal must be consulted** to determine the investigation protocol. A review of findings, conclusions and action plan is required with the HR Director, Legal and line management before concluding the investigation.

Legal Advisor*:	Date:
Corporate Security:	Date:
HR Director:	Date:
Senior Line Management:	Date:

DISPOSITION OF COMPLAINT/CONCERN

Disposition must be carried out **within two days** of receipt of completed investigation report.

Disposition Date: .

Check the appropriate box.

- | | |
|---|--|
| <input type="checkbox"/> Verbal Warning | <input type="checkbox"/> Contractor disciplinary Action |
| <input type="checkbox"/> Performance Memo-to-File | <input type="checkbox"/> Unresolved (investigation failed to identify a guilty party) |
| <input type="checkbox"/> Performance Memorandum | <input type="checkbox"/> Unsubstantiated (investigation failed to prove allegation of the complaint) |
| <input type="checkbox"/> Employee Commitment Plan (ECP) | |
| <input type="checkbox"/> Termination | |
| <input type="checkbox"/> Other: | |

Submitted By: _____ Date: _____

Submit Initial and Final forms to Kodak Alaris HR at kpp-hr-usc@kodakalaris.com.