

EXHIBIT A
VelocityEHS INC. ANTI-HARASSMENT POLICY

Purpose: *The purpose of this policy is to make clear that harassment will not be tolerated at VelocityEHS Inc. and to set forth the procedure for filing harassment complaints.*

POLICY

VelocityEHS Inc. remains committed to the premise that all individuals have a right to function in a working environment that is safe, productive, respectful, and free from discrimination. In keeping with this commitment, harassment, based on legally protected characteristics, will not be tolerated.

Any words or actions that create an intimidating, hostile or offensive working environment for any of us is disrespectful, an embarrassment to VelocityEHS Inc., and contrary to our business objectives. We are all responsible for ensuring that harassment does not occur.

Under this policy, VelocityEHS Inc. also prohibits harassment by an employee against a non-employee, and by a non-employee against an employee. Retaliation against an employee who has filed a harassment complaint or participates as a witness in the investigation of such a complaint is prohibited. VelocityEHS Inc. also prohibits frivolous and malicious harassment complaints.

DEFINITIONS

(A) Definition of Harassment:

“Harassment,” based on legally protected characteristics, is a form of illegal discrimination. It generally occurs when words or actions, which are of a severe or pervasive nature, create an intimidating, hostile, or offensive working environment.

VelocityEHS Inc. prohibits harassment on the basis of the race, color, religion, gender, sexual orientation, gender identity, national origin, age, status as a disabled individual, protected veteran status, or any other legally protected characteristic of an individual. And further, in accordance with the Equal Employment Opportunity Commission (EEOC) guidelines, VelocityEHS Inc. prohibits harassment on the basis of any legally protected characteristic of an employee’s relatives, friends or associates.

(B) Definition of Sexual Harassment:

The EEOC has issued guidelines which define sexual harassment as:

- unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when such conduct is made either explicitly or implicitly a term or condition of an individual's employment; or
- (when) rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- (when) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

The technical definition describes two types of sexual harassment: "quid pro quo" and "hostile work environment."

The first two bullets describe quid pro quo sexual harassment. Quid pro quo literally means "this for that," and occurs when a supervisor or someone with authority to influence an employee's job uses or threatens to use that authority to extort sexual favors.

Some examples of quid pro quo sexual harassment include: offering employment benefits or giving preferential treatment in exchange for sexual favors, and retaliating against or getting back at an employee who rejects sexual advances.

The third bullet describes hostile work environment sexual harassment. This type of harassment occurs when a supervisor, co-worker, subordinate, or a non-employee engages in conduct that is severe or pervasive enough to alter the conditions of an employee's job and create a hostile or abusive working environment.

Some examples of conduct which may constitute hostile work environment sexual harassment include: leering; sexual gestures; displaying sexually suggestive objects or pictures, cartoons, calendars, magazines or posters; whistling and cat calls; making derogatory or sexual comments, epithets or jokes; unwelcome physical contact; threatening conduct, including assault or blocking someone's movement; and repeated and unwelcome comments about someone's physical appearance.

All forms of sexual harassment involve "unwelcome conduct"; meaning, conduct that was not solicited or incited by the victim. This includes words or actions between people of different genders or of the same gender.

(C) Definition of Sexual Orientation:

Sexual orientation means lesbian, gay, bisexual, or heterosexual orientation, real or perceived, as manifested by identity, acts, statements, or associations.

COMPLAINT PROCEDURE

1. An individual who believes that he or she has been harassed or has witnessed harassment occurring must bring this to the attention of his or her immediate supervisor or next level. In the alternative, the individual should consult his or her Human Resources Representative, or the site/unit EEO Coordinator.
2. An individual who brings such a complaint to the attention of the company, in good faith, will have it promptly investigated in an impartial manner on a need-to-know basis.
3. If a harassment complaint is substantiated, immediate and appropriate remedial action will be taken, up to and including job termination.
4. VelocityEHS Inc. strongly believes in internal resolution of harassment complaints, but recognizes that an individual has the right to file a charge with the appropriate state or federal agency.

VelocityEHS HR Representative Contact Information:

Rachel Kaiser

Vice President, Human Resources
rkaiser@ehs.com

Nikki Buchan

Senior Director, Human Resources
nbuchan@ehs.com

Lindsay Hanson

Senior Manager, Human Resources
lhanson@ehs.com

Jessica Nowacky

Senior Human Resources Specialist
jnowacky@ehs.com