



DISCRIMINATION, HARASSMENT, RETALIATION, AND REPORTING FOR NON-EMPLOYEES

Equal Opportunity Statement

RMI is dedicated to the principles of equal opportunity. We prohibit discrimination on the basis of any legally recognized basis, including but not limited to: age (40 and over), race, color, sex, pregnancy (including lactation, childbirth or related medical conditions), religion, national origin, ancestry, physical or mental disability, genetic information (including testing and characteristics), sexual orientation, gender express/identity, uniformed servicemember status, veteran status, citizenship status or any other status protected by applicable law. This policy applies to all persons involved in our operations, including all employees and non-employees such as clients, vendors, contractors, consultants, etc.

Anyone who believes that he or she has been discriminated against should follow the Procedure for reporting Discrimination, Harassment and Retaliation set forth below.

Anti-Harassment Policy

RMI is committed to a work environment in which all individuals are treated with respect and dignity. As a result, RMI maintains a strict policy prohibiting sexual harassment and harassment based on any legally recognized status, including, but not limited to: age (40 and over), race, color, sex, pregnancy (including lactation, childbirth or related medical conditions), religion, national origin, ancestry, physical or mental disability, genetic information (including testing and characteristics), sexual orientation, gender express/identity, uniformed servicemember status, veteran status, citizenship status or any other status protected by applicable law. Every individual has the right to work in a professional atmosphere that promotes equal opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, RMI expects that all relationships among persons in the office will be business-like and free of bias, prejudice and harassment.

RMI's anti-harassment policy applies to all persons involved in its operations, regardless of their position, and prohibits harassing conduct by any employee and non-employee of RMI. This policy also prohibits harassment by third parties, such as customers, vendors, clients, visitors, or temporary or seasonal workers. If such harassment occurs in the workplace by someone not employed by RMI, the procedures in this policy should be followed. The workplace includes: actual worksites, any setting in which work-related business is being conducted (whether during or after normal business hours), company-sponsored events, or company owned/controlled property.

Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other visual, verbal or physical conduct of a sexual nature, when:

- Submission to such conduct is made explicitly or implicitly a term or condition of employment.
- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment.
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

All employees and non-employees are expected to conduct themselves in a professional and businesslike manner at all times. Sexual harassment includes various forms of offensive behavior based on sex, including but not limited to:

- Unwelcome sexual advances or propositions (including repeated and unwelcome requests for dates);
- Offers of employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, text messages calendars, notes, letters, or e-mails;

- Verbal conduct: making or using sexually derogatory comments, innuendos, epithets, slurs, sexually explicit jokes, foul or obscene language of a sexual nature, gossiping or questions about another's sex life, comments about an individual's body or dress, whistling or making suggestive or insulting sounds;
- Verbal and/or written abuse of a sexual nature, graphic verbal and/or written sexually degrading commentary about an individual's body or dress, sexually suggestive or obscene letters, notes, invitations, emails, text messages, tweets or other social media postings;
- Physical conduct: gestures and other nonverbal behavior, such as unwelcome touching, grabbing, fondling, kissing, massaging, brushing up against another's body, assault or impeding or blocking normal movements; and
- Retaliation for making reports or threatening to report sexual harassment.

Other Types of Harassment

Harassment on the basis of any legally protected status is also strictly prohibited, including harassment based on: age (40 and over), race, color, sex, pregnancy (including lactation, childbirth or related medical conditions), religion, national origin, ancestry, physical or mental disability, genetic information (including testing and characteristics), sexual orientation, gender express/identity, military uniformed servicemember status, or veteran status, citizenship status or any other status protected by applicable law. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual or group, and that a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; b) has the purpose or effect of unreasonably interfering with an individual's work performance; or c) otherwise adversely affects an individual's work opportunities.

Prohibited harassment may include behavior similar to the illustrations above pertaining to sexual harassment. It also includes, but is not limited to:

- Verbal conduct including taunting, threats, epithets, slurs, jokes, derogatory comments or stereotyping based on an individual's protected status;
- Visual and/or written conduct including derogatory posters, photographs, calendars, cartoons, drawings, websites, emails, text messages, tweets, blogs, social networking sites, gestures, or other written or visual conduct based on an individual's protected status; and
- Physical conduct including assault, intimidating or hostile acts, or unwanted touching or blocking normal movement because of an individual's protected status.

Procedure for Reporting Discrimination, Harassment and Retaliation

Individuals who believe they have been subjected to or witnessed discrimination, harassment or retaliation should report it immediately. Non-employee complaints can be made verbally, or in writing, to the People Team, the Chief People Officer, or the EEO/AA Coordinator. Non-employees are not required to report any prohibited conduct to anyone who may be hostile, who has engaged in such conduct, who is a close associate of the person who has engaged in such conduct, or with whom the non-employee is uncomfortable discussing such matters.

Non-employees are encouraged, but not required, to communicate to the offending person that the conduct is offensive and unwelcome.

After a report is received, a thorough and objective investigation will be undertaken. Your complaint will be kept as confidential to the extent practicable and permitted by law. Confidentiality will be maintained to the extent practicable and in accordance with applicable law. The investigation will be completed, and a determination made and communicated as soon as practical.

If RMI determines that a complaint of prohibited harassment, discrimination or retaliation is substantiated or an employee's or non-employee's behavior is in violation of this policy, appropriate action will be taken. If a complaint cannot be substantiated, RMI may take appropriate action to reinforce its commitment to providing a work environment free from harassment, discrimination and retaliation.

The initiation of a good-faith complaint of harassment or retaliation will not be grounds for disciplinary action, even if the allegations cannot be substantiated. Any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline.

Protection against Retaliation

Retaliation is prohibited against any person by another non-employee, an employee, or by RMI for using this complaint procedure, reporting proscribed harassment, objecting to such conduct or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency.

Individuals who believe they have been subjected to retaliation or believe that another individual has been subjected to retaliation, should follow the Procedure for Reporting Discrimination, Harassment and Retaliation set forth above. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation prohibited by this policy is substantiated, appropriate action will be taken. If a complaint cannot be substantiated, RMI may take appropriate action to reinforce its commitment to providing a work environment free from retaliation.

Reporting and Anti-Retaliation Policy

We Encourage A Speak Up Culture

Choosing to speak up about workplace concerns helps build a healthy, ethical, and compliant company and is part of our culture. To promote that culture, RMI encourages employees and non-employees to speak up and raise questions and concerns promptly about any situation that may violate RMI's policies or procedures. It benefits all of us if we raise our concerns so the Institute may consider them carefully and address them properly.

Raise Good-Faith Questions and Concerns

Consistent with our commitment to ethics, compliance, and the law, we welcome your good-faith questions and concerns about any conduct you believe may violate our policies and procedures, the law, and best practices, especially conduct that may be illegal, fraudulent, unethical, or retaliatory.

We promote an environment that fosters honest, good-faith communications about matters of conduct related to our business activities, whether that conduct occurs within RMI, involves one of RMI's contractors, suppliers, consultants, or clients, or involves any other party with a business relationship to RMI.

RMI Does Not Tolerate Retaliation

Coming forward with questions or concerns may sometimes feel like a difficult decision, but we are committed to fostering an environment that does not deter individuals from speaking up when they observe conduct that may violate our policies and procedures, the law, and best practices. For that reason, the Institute will not tolerate retaliation of any kind because an employee or non-employee in good faith raises a question or concern about a violation or suspected violation of our policies and procedures, the laws and regulations under which we do business, best practices or because the employee or non-employee participates in or cooperates with an investigation of such concerns.

Retaliation may occur through conduct or written communication and may take many forms, including actual or implied threats, verbal or nonverbal behaviors, coercion, bullying, intimidation, or deliberate exclusionary behaviors.

It is the Institute's policy to adhere to all applicable laws protecting our employees and non-employees against unlawful retaliation or discrimination as a result of their raising good-faith questions or concerns. If you are ever aware of an instance or threat of retaliation, please immediately report it.

How to Raise Questions and Concerns

Non-employees can submit their good-faith questions or concerns about conduct they believe may violate policies and procedures, the law, and best practices to:

- the People Team.
- the Chief People Officer; or
- the EEO/AA Coordinator.

When a non-employee raises a concern, the Institute will maintain confidentiality to the fullest extent possible, consistent with applicable legal requirements and the need to conduct an adequate investigation or review.

When raising concerns, we ask that non-employees provide as much detailed information as possible, including the background and history of the concern, names, dates and places where possible, and the reasons why the situation is cause for concern. This is especially important for concerns raised anonymously, so that the Institute may conduct an appropriate review and if necessary, begin an investigation.

What RMI Will Do

RMI is committed to reviewing all reported concerns, conducting proper, fair and thorough investigations tailored to the circumstances, and taking appropriate remedial and concluding steps as warranted. All action taken by the Institute in response to a concern will necessarily depend on the nature and severity of the concern. This may include initial inquiries and fact-gathering to decide whether an investigation is appropriate and, if so, the form and scope of the investigation. Note that an investigation into concerns raised is not an indication that they have either been confirmed or rejected. The Institute complies with the law in conducting investigations and expects that employees and non-employees will cooperate with an investigation, except when voluntary compliance with an investigation is being requested. The Institute also expects that employees and non-employees will provide truthful information when participating in an investigation.

Remember, all good-faith concerns and reports raised under this policy will be taken seriously.

Adherence to This Policy

Non-employees who believe that they have been subjected to any conduct that violates this policy may register a complaint using the procedures outlined above. Any non-employee who unlawfully discriminates or retaliates against another employee or non-employee as a result of his or her protected actions as described in this policy may be subject to corrective action.