



<b>Title</b> Harassment, Discrimination and Retaliation Prevention Policy	
<b>Revision</b> 2	<b>Document ID</b> HR-POLICY-7.05.06.04
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<b>Applies To</b>	AEROJET ROCKETDYNE
<b>Content Expert</b>	Gaal, Kenneth
<b>Nature of Change</b>	Minor. Revised for editorial changes.

<b>PURPOSE AND SCOPE</b>	<p>Aerojet Rocketdyne Holdings, Inc. and all of its Subsidiaries (collectively, the “Company”) believes in respecting the dignity of every employee and expects every employee to show respect for all of our employees, other colleagues, customers, and vendors. Respectful, professional conduct furthers the Company’s mission, promotes productivity, minimizes disputes, and enhances our reputation.</p> <p>The Company is committed to providing a work environment free of discrimination, harassment, retaliation, and other unwelcome conduct based on any legally protected status.</p>
<b>REQUIREMENTS ORIGIN</b>	Company Mandate

**Policy**

This Policy forbids sexual and other workplace discrimination, harassment, retaliation and any other disrespectful or other unprofessional conduct and specifically prohibits any unwelcome conduct that is based on an individual’s race “(including traits historically associated with race, including but not limited to, hair texture and protective hair styles (e.g., braids, locks, and twists), color, national origin, ancestry, religion/religious creed (including religious dress and grooming practices), sex (including pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), sex stereotyping (including assumptions about a person’s appearance or behavior, gender roles, gender expression, or gender identity), age, sensory, physical or mental disability, medical condition, genetic information, marital status, sexual orientation, gender, gender expression, gender identity, transgender, military and veteran status, citizenship status or immigration status (as appropriate), or any other protected status of an individual or that individual’s associates or relatives that is prohibited by law. The Company interprets these statuses broadly to include both the actual status and also any perceptions and assumptions made regarding these statuses.

**All such conduct violates Company Policy.**

The conduct prohibited by this Policy includes any discriminatory employment action and any unwelcome verbal, physical, or visual conduct that is inflicted on someone because of that individual’s protected status or the protected status of that individual’s associates or relatives The Company prohibits all such conduct in the workplace, even if the conduct is not sufficiently severe or pervasive to constitute unlawful harassment.

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal, physical, or visual conduct based on sex.

Sexual harassment includes gender-based harassment, which often is sexual in nature but sometimes is not. This Policy forbids harassment based on gender regardless of whether the offensive conduct is sexual in nature or motivated by sexual desire. Any unwelcome conduct based on gender is also



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forbidden by this Policy regardless of whether the individual engaged in the harassment and the individual being harassed are the same or different genders.

According to the U.S. Equal Employment Opportunity Commission (“EEOC”), unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct based on sex constitute unlawful sexual harassment when (1) submission to such conduct becomes an implicit or explicit term or condition of employment, (2) submission to or rejection of the conduct is used as the basis for any employment decision, or (3) the conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment.

This policy forbids harassment based on sex or gender regardless of whether it rises to the level of a legal violation.

### Examples

The conduct prohibited by this policy, includes any discriminatory employment action and any unwelcome conduct, whether verbal, physical, or visual, that is inflicted on someone because of that individual’s protected status or the protected status of that individual’s associates or relatives. The types of unwelcome conduct prohibited by this Policy includes, but are not limited to the following behavior:

1. Verbal harassment, including epithets, slurs, stereotyping, intimidating acts, and the circulation or posting of written or graphic materials that show hostility toward individuals because of their protected status.
2. Physical harassment, including assault, unwanted touching, hitting, pushing, or other aggressive physical contact, including threats to take such action.
3. Sexual harassment including:
  - a. Offensive sex-oriented verbal kidding, teasing, or jokes
  - b. Repeated unwanted sexual flirtations, advances, or propositions
  - c. Verbal abuse of a sexual nature
  - d. Graphic or degrading comments about an individual's appearance or sexual activity
  - e. Offensive visual conduct, including leering, making sexual gestures, the display of offensive sexually suggestive objects, or picture, cartoons, or posters
  - f. Unwelcome pressure for sexual activity
  - g. Offensively suggestive or obscene e-mails, letters, notes, or invitations
  - h. Offensive physical contact such as patting, grabbing, pinching, or brushing, against another’s body.
4. Sexual favoritism in the making of any employment decision. Sexual favoritism can occur whenever a supervisor or manager makes a decision based upon an employee’s receptiveness to sexual advances.
5. Conduct of any kind in retaliation for reporting or threatening to report harassment or discrimination.
6. Prohibited harassment includes not only sexual harassment but also any unwelcome conduct based on any legally protected category.



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## Reporting

The Company requires all individuals to report any incidents of harassment, discrimination, retaliation or other conduct prohibited by this Policy immediately so that complaints can be quickly and fairly resolved.

Any employee who believes he or she has been subjected to, witnessed or is otherwise aware of any conduct that is inconsistent with this Policy must notify the facility Human Resources Manager, any other Human Resources Representative, the designated facility ethics officer, or a Company attorney as soon as possible after the incident. You may also use the Company's Ethics and Compliance Helpline (855-346-5043). These are the individuals who are authorized by this Policy to receive and act upon complaints of harassment, discrimination or retaliation on behalf of this Company. This policy does not require reporting harassment, discrimination, or retaliation directly to an employee's supervisor or to any individual who is creating the harassment, discrimination, or retaliation.

Any manager or supervisor who receives a report of conduct inconsistent with this Policy or who otherwise is aware of conduct inconsistent with this policy is to report immediately to the facility Human Resources Manager or any other Human Resource Representative.

You should also be aware that the Federal Equal Employment Opportunity Commission ([www.eeoc.gov](http://www.eeoc.gov)), the Department of Justice's Immigrant and Employee Rights Section ([www.justice.gov/ier](http://www.justice.gov/ier)) (for certain allegations of citizenship status or national origin discrimination - or retaliation based on such allegations) and the state agencies such as the California Department of Fair Employment and Housing investigate and prosecute complaints of prohibited harassment, discrimination and retaliation in employment. If you think you have been harassed or discriminated against or been retaliation against for resisting, complaining or participating in an investigation, you may also file a complaint with the appropriate agency. The nearest office can be found by visiting the agency websites.

## Company Response

The Company will conduct a prompt, fair and effective investigation of all reports of conduct that is inconsistent with this Policy and reach reasonable conclusions based on the information collected. To that end, parties involved in the situation (including the reporting party, anyone identified as the target of the behavior (if different than the reporting party), and anyone who allegedly violated this policy) will be offered an opportunity to be interviewed or to otherwise respond to a report under this policy. The Company may put reasonable interim measures in place while the investigation proceeds.

Once the report has been thoroughly investigated, the Company will take further action appropriate under the circumstances. That action may be a conclusion that a violation occurred, as explained immediately below. The Company might also conclude, depending on the circumstances, either that no violation of policy occurred or that the Company cannot conclude whether or not a violation occurred.

If an investigation reveals that a violation of this Policy or any other inappropriate conduct has occurred, then the Company will take corrective action, including discipline up to and including termination, reassignment, changes in reporting relationships, training, or other measures the Company deems appropriate under the circumstances, regardless of the job positions of the parties involved. The Company may take corrective action for any inappropriate conduct discovered in investigations, regardless of whether the conduct amounts to a violation of law or even a violation of this Policy. If the



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person who engaged in the prohibited conduct is not employed by the Company, then the Company will take whatever corrective action is reasonable and appropriate under the circumstances.

Employees should also be aware that if they engage in unlawful harassment, they can be held personally liable for the misconduct.

**Confidentiality**

In investigating and in taking any appropriate action, the Company will maintain confidentiality to the extent possible. The Company’s duty to investigate and take corrective actions may require disclosure of information to individuals with a need to know.

**No Retaliation Allowed**

No retaliation or other adverse action will be taken against any employee, former employee, or applicant for good faith reporting prohibited conduct, assisting another in making a report, cooperating in an investigation into such alleged conduct or for filing a claim with any federal or state agency. Anyone who experiences or witnesses any conduct they believe to be retaliatory should immediately follow the reporting procedures set forth above.

**Responsibility**

Everyone at the Company is responsible to help keep our workplace free from prohibited discrimination, harassment and retaliation. Everyone is expected to avoid any behavior that could reasonably be interpreted as conduct prohibited by this policy. Every employee is expected to inform any person in the workplace whose conduct the employee finds unwelcome.

Management at every Company location is responsible for posting this policy in a conspicuous place.

**RESOURCES:**

<b>Definitions</b>
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None.

<b>Acronyms</b>	<b>Acronym</b>	<b>Definition</b>
None.		

<b>References</b>	<b>Identification</b>	<b>Title</b>
None		

<b>Training</b>	<b>Identification</b>	<b>Title/Description</b>
None.		

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