

Sony Picture Studios Transportation

POLICY AGAINST UNLAWFUL HARASSMENT

POLICY STATEMENT

Sony Pictures Studios (the Company) is committed to providing a work environment that is free of harassment and discrimination. Company policy prohibits sexual harassment and harassment or discrimination based on pregnancy, childbirth, or related medical condition, race, gender, religion, color, national origin or ancestry, physical or mental disability, medical condition, marital 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 prohibits harassment by any employee of the Company, including supervisors and co-workers. Or by persons doing business with or for the Company.

PROHIBITED CONDUCT

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

- Verbal conduct such as epithets, derogatory jokes or comments, slurs, negative stereotyping or unwanted sexual advances, invitations or comments.
- Visual conduct such as posters, photography, cartoons, and drawings on Company premises or circulated in the workplace that denigrate or show hostility or aversion towards an individual or group because of characteristics identified above.
- Physical conduct such as intimidation, threats, assault, unwanted touching, blocking normal movement or interfering with work because of any characteristics identified above.
- 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.
- Retaliation for reporting or threatening to report harassment.

Whether or not the offending employee means to give offense or believed his or her comments or conduct were welcome is not determinative. Rather, the Company's policy is violated when another employee, whether the recipient or a mere observer, is in fact offended by comments or conduct which are based on race, gender, religion, color, national origin or ancestry, physical or mental disability, medical condition, marital status, age, or sexual orientation.

It is a violation of this policy for males to sexually harass females or other males, and for females to sexually harass males or other females. Sexual harassment on the job is prohibited whether it involves co-worker harassment, harassment by a supervisor or manager, or by persons doing business with or for the Company.

COMPLAINT PROCESS

Individuals who believe they have been harassed on the job should provide a written or verbal complaint to their own or any other supervisor or to a Human Resources representative, as soon as possible. The complaint should include details of the incident(s), names of the individuals involved, and the names of any witnesses. Supervisors and managers must immediately refer all harassment complaints to the Human Resources Department.

All incidents of harassment that are reported will be investigated. The Human Resources Department will promptly undertake an effective, thorough and objective investigation of the harassment allegations. The investigation will be completed and a determination regarding the harassment alleged will be made and communicated to the individual(s) who complained and the accused harasser(s). If the Company determines that a violation of this policy has occurred, it will take appropriate action to deter any future harassment, and also where appropriate, disciplinary action, up to and including termination, will be taken.

The Company's policy and California law prohibit retaliation against an individual for using this complaint procedure or filing, testifying, assisting, or participating in any manner in any investigation, proceeding or hearing conducted by the Company or a federal or state enforcement agency. Employees who believed they have been retaliated against in violation of this policy should report the facts to their supervisor or Human Resources representative.

All employees and individuals performing services for the Company are expected to comply with this policy and to cooperate with investigations of complaints of harassment.

ADDITIONAL ENFORCEMENT INFORMATION

In addition to the Company's internal complaint procedure, the California Department of Fair Employment and Housing (DFEH) investigates and prosecutes complaints of unlawful harassment in employment. Individuals who believe that they have been unlawfully harassed may file a complaint with the DFEH within one (1) year of the alleged harassment. The DFEH serves as a neutral fact finder and attempts to help the parties voluntarily resolve disputes. If the DFEH finds evidence of harassment and settlement efforts fail, the DFEH may file a formal accusation against the employer and harasser. The accusation may lead to either a public hearing before the Fair Employment and Housing Commission or a lawsuit filed on the complaint's behalf by the DFEH. If the Commission finds that harassment has occurred, it can order remedies including hiring or reinstatement, back pay, and charges in the practices of the involved employer. The address and telephone number of the local office of the DFEH is located in the telephone directory.

Employees of the Company who work outside California should consult their local state agency charged with administering harassment complaints.

Driver's Signature

Name Printed

Date

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