



July, 2021

## **Cardo – Code of Conduct**

### **Anti-Harassment and Antidiscrimination Policy**

It is our policy and our responsibility to provide our employees with a workplace free from harassment and discrimination. Cardo System Ltd. (“**Cardo**”) will not tolerate harassment or discrimination of any individual on any basis including the following legally protected characteristics: age, race, religion, creed, color, sex, pregnancy (including childbirth, lactation and related medical conditions), national origin, ancestry, physical or mental disability, military status, citizenship, or other classifications protected by applicable laws. All such harassment is unlawful. Cardo’s anti-harassment policy applies to all persons involved in the operation of Cardo and prohibits unlawful harassment by any employee of Cardo, including managers and supervisors, as well as vendors, customers, independent contractors, manpower and outsourcing employees and any other persons with whom an employee is in contact with as part of Cardo’s business. It also prohibits unlawful harassment based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics.

If such conduct is deemed by Cardo to interfere with an individual’s work performance or has the purpose or effect of creating an intimidating, hostile, or offensive work environment, Cardo will take appropriate action.

#### **I. Sexual Harassment**

The Israeli law defines sexual harassment as: (1) Sexual extortion (for example: A manager threatens to dismiss an employee if she does not submit to his sexual demand); (2) An indecent act (for example: An employee or manager who touches another employee for sexual arousal or exposes himself/herself to her/him, against her/him will or a manager who carries out such acts towards an employee under his/her authority while exploiting their labor relations); (3) Repeated proposals of sexual nature, although the person they are pointed at has shown no interest in them. However, the law determines several cases in which there is no need to show “lack of interest” so such a behavior will be considered as sexual harassment, one of those case is an employee - in the framework of labor relations, while exploiting authority in labor relations; (4) Repeated remarks towards a person focusing on that person’s sexuality or gender, although the person they are addressed at has shown they are not interested in such (for example: employee that has repeatedly made remarks to another employee referring to a sexual aspect of the employee’s appearance, although such employee has made it clear such remarks bother him or her). However, there is no need to show "lack of interest", inter alia, in the cases of employee - in the framework



of labor relations, while exploiting authority in labor relations - so that such behavior will be considered as sexual harassment; (5) Humiliating treatment towards a person's sex or sex orientation, whether or not the harasser has shown that it bothers him or not; (6) Distribution (or Publication) of a photograph, film or recording of a person, including editing or a combination of those, provided that in the circumstances of the matter it is possible to identify the person, which are focused on his sexuality, in circumstances in which the distributor may humiliate or degrade the person, and the distribution was without the person consent. Proposals or remarks as specified in section (3) and (4), addresses towards an employee within the framework of an employment relationship, and toward a person in service with the framework of such service, by exploitation of authority and discipline in labor relations or in the service, will be considered as a Sexual Harassment, even if the harassed person not demonstrated to the harasser that he is not interested in the said propositions or references.

It is unlawful 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 unlawful whether it involves coworker harassment, harassment by a manager or supervisor, or by persons, including customers or clients, doing business with or for Cardo.

If you believe that you have been subjected to sexual harassment, or have witnessed or otherwise become aware of such an incident (and preferably you have evidence that the person harassed agree to the complaint) you may report the incident either verbally or in writing to the designated reporting representative Mrs. Anat Gafni whose contact details are [anatg@cardosystems.com](mailto:anatg@cardosystems.com).

Further information regarding the provisions of the Prevention of Sexual Harassment Law (in Israel) 1998, the Regulations for the Prevention of Sexual Harassment (Employers' Obligations), 1998, and Company's Sexual Harassment Policy, you may find in the Company's HR platform.

Regarding the Company's Prevention of Sexual Harassment Policy, please see the company's local policy in your employment jurisdiction.

The Company's Sexual Harassment Policy is also posted in the Company's HQ cafeteria.

## **II. Other Forms of Harassment**

Harassment on the basis of the following legally protected characteristics: gender, race, color, religion, creed, pregnancy (including childbirth and related medical conditions), age, national origin or ancestry, physical or mental disability, or any other consideration protected by law is also prohibited. Examples of prohibited harassment include but are not limited to:

1. Verbal conduct including threats, epithets, derogatory comments, insulting or inappropriate comments, or slurs;
2. Visual conduct including derogatory posters, photography, cartoons, drawings, emails, websites, gestures or graffiti;
3. Physical conduct including assault, unwanted touching or blocking normal movement; and
4. Retaliation for making harassment reports or threatening to report harassment.

## **III. Complaint Procedure and No-Retaliation Policy**

If you experience or witness any form of harassment or discrimination in the workplace, please immediately notify Mrs. Anat Gafni whose contact details are [anatg@cardosystems.com](mailto:anatg@cardosystems.com). We encourage you to come forward with complaints—the sooner we learn about the problem, the sooner we can take steps to resolve it.

Cardo will not retaliate, or allow retaliation, against anyone who complains of discrimination or harassment, assists in a discrimination or harassment investigation or files an administrative charge or lawsuit alleging discrimination or harassment. All managers are required to immediately report any incidents of discrimination or harassment.

Complaints will be investigated quickly. Those who are found to have violated this policy will be subject to appropriate disciplinary action, up to and including termination.