

CODE OF CONDUCT

HARASSMENT AND DISCRIMINATION



OBJECTIVE

10K Brewing maintains a ZERO TOLERANCE policy explicitly forbidding harassment and discrimination in the work environment.

10K Brewing's continuing mission and values: *Our beer is "Brewed in the Land of 10K Lakes", and that means something to us. It means Minnesota values. "Nice Beer. Nice People."*

These values shall establish and maintain a work environment in which people are treated with dignity, decency and respect. The environment should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. 10K Brewing will not tolerate harassment or discrimination of any kind. 10K Brewing will seek to prevent, correct and discipline behavior that violates this policy.

All employees AND contractors, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee or contractor who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or termination of employment.

Managers and supervisors who knowingly allow or tolerate discrimination, harassment or retaliation, including the failure to immediately report such misconduct to ownership are in violation of this policy and subject to discipline.

PROHIBITED CONDUCT UNDER THIS POLICY

10K Brewing, in compliance with all applicable federal, state and local anti-discrimination and harassment laws and regulations, enforces this policy in accordance with the following definitions and guidelines:

DISCRIMINATION

It is a violation of 10K Brewing's policy to discriminate in the provision of employment opportunities, benefits or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, the person's race, color, national origin, age, religion, disability status, sex, sexual orientation, gender identity or expression, genetic information, marital status or other applicable protected classes under federal, state or local law.

Discrimination in violation of this policy will be subject to disciplinary measures up to and including termination.

HARASSMENT

10K Brewing prohibits harassment of any kind, including sexual harassment, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy, harassment is any verbal or physical conduct designed to threaten, intimidate or coerce an employee, co-worker, or any person working for or on behalf of 10K Brewing.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

Verbal harassment includes comments that are offensive or unwelcome regarding a person's national origin, race, color, religion, age, sex, sexual orientation, pregnancy, appearance, disability, gender identity or expression, marital status or other protected status, including epithets, slurs and negative stereotyping.

Nonverbal harassment includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of national origin, race, color, religion, age, gender, sexual orientation, pregnancy, appearance, disability, sexual identity, marital status or other protected status.

Harassment in violation of this policy will be subject to disciplinary measures up to and including termination.

SEXUAL HARASSMENT

Sexual harassment is prohibited and can include any unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

Submission to or rejection of such conduct is used as the basis or factor for employment decisions; such conduct has the purpose or effect of unreasonably interfering with any employee's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature:

Is made explicitly or implicitly a term or condition of employment.

Is used as a basis for an employment decision.

Unreasonably interferes with an employee's work performance or creates an intimidating, hostile or otherwise offensive environment.

Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

Verbal sexual harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or "kidding" that is oriented toward a prohibitive form of harassment, including that which is sexual in nature and unwelcome.

Nonverbal sexual harassment includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters, notes, facsimiles, e-mails, photos, text messages, tweets and Internet postings; or other forms of communication that are sexual in nature and offensive.

Physical sexual harassment includes unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, and forced sexual intercourse or assault.

Courteous, mutually respectful, pleasant, non-coercive interactions between employees that are appropriate in the workplace and acceptable to and welcomed by both parties are not considered to be harassment, including sexual harassment.

RETALIATION

Lodging a bona fide complaint will in no way be used against the employee or have an adverse impact on the individual's employment status. However, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation.

Any person who is found to have violated this aspect of the policy will be subject to discipline up to and including termination of employment. Any person who retaliates against any person who complains of alleged harassment or discrimination will be subject to discipline up to and including termination of employment.

CONFIDENTIALITY

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. 10K Brewing will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation.

COMPLAINT PROCEDURE

If you believe you have been a victim of harassment, you must take the following steps:

Immediately demand that the person stop at once.

Report the matter to your supervisor, manager or ownership.

Complaints should be submitted as soon as possible after an incident has occurred, preferably in writing regardless of whether it takes place on-duty or off-duty, whether engaged by a coworker, supervisor, customer, vendor or supplier if it is related in any way to your employment.

Each complaint must be as detailed as possible, stating when the harassment or retaliation occurred, what exactly happened, where the incident occurred, who was responsible, whether the complaining party instructed the harasser to stop, witnesses, and any steps the complaining party recommends to investigate or stop the occurrence of harassment.

All complaints of prohibited harassment, discrimination and retaliation will be investigated promptly, impartially and confidentially. If it is determined that a violation of this policy has occurred, appropriate disciplinary action, up to and including termination of employment will be taken. The type of action taken will be determined by 10K Brewing, in its discretion, with consideration given to the severity, frequency, and nature of the offense.

ALTERNATIVE LEGAL REMEDIES

Nothing in this policy may prevent the complainant or the respondent from pursuing formal legal remedies or resolution through local, state or federal agencies or the courts.