

Policy Against Harassment- Respect In The Workplace

It is the policy of CBI, Inc. and its affiliates ("CBI") to provide a working environment in which all individuals are treated with respect and dignity, free from harassment of any kind, including harassment based on race, color, gender, religion, national origin, ethnic origin, disability, age and any other basis proscribed by applicable federal and state non-discrimination laws where CBI has offices.

Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display, distribution and/or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through e-mail, social networks and the internet generally).

Sexual harassment is among the conduct that is strictly prohibited both under CBI's policy and broadly by federal and state law. Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Sexual harassment may exist where actual or promised job, compensation, promotion, favorable reviews, or other employment benefits are conditioned on granting sexual favors. Sexual harassment may also exist where there is a hostile, intimidating work environment caused by unwanted sexual advances or unwanted visual, verbal or physical conduct of a sexual nature.

Depending on the circumstances, some examples of inappropriate conduct may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; inquiries into one's sexual experiences or history; discussions of one's sexual activities; display, distribution and/or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail or internet); and other physical, verbal or visual conduct of a sexual nature.

Individuals and Conduct Covered

This policy applies to all applicants for employment and full-time, part-time and temporary employees of CBI and prohibits harassment, discrimination and retaliation whether engaged in by fellow employees, by a supervisor or manager or by someone not directly connected to CBI (e.g., an outside vendor, consultant, independent contractor, or customer).

Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

Retaliation Is Prohibited

CBI policy as well as federal and state laws strictly prohibits retaliation against any individual who reports discrimination or harassment, participates in an investigation of such reports, or otherwise engages in protected activity.

Complaint Procedure



CBI will keep all complaints of harassment confidential to the extent possible, except as otherwise required by law.

Reporting an Incident of Harassment, Discrimination or Retaliation

CBI strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe they have experienced conduct that they believe is contrary to CBI's policy or who have concerns about such matters should file a complaint with one of the following individuals:

- CBI's Chief Executive Officer, Frederic Chesnais (email: <u>FredChesnais@cbicorp.io</u> telephone: + 971 54 377 3145);
- CBI's General Counsel, Alain Scémama (email: <u>alainscemama@cbicorp.io</u> telephone: +33 6 28 26 93 63);
- CBI's outside counsel, David Malamed. (email: <u>dmalamed@monceyavocats.com</u> telephone: +33 1 80 27 24 96).

This may be done in writing or orally. Individuals should not feel obligated to file their complaints in a particular order before bringing the matter to the attention of any one of the designated representatives identified above.

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. Therefore, while no fixed reporting period has been established, CBI strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken.

In addition to following this complaint procedure, employees are encouraged to inform employees making potentially harassing statements to discontinue doing so immediately.

Responsive Action

Because CBI takes allegations of sexual, psychological, mental or any other form of harassment seriously, we will respond promptly to complaints of sexual, psychological, mental or other harassment by conducting a fair and expeditious investigation and, where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate. Our investigation will include a private interview with the person filing the complaint and with witnesses. We will also interview the person alleged to have committed the sexual, psychological, mental or other form of harassment. Employees who are found to have engaged in harassment, discrimination or retaliation may face disciplinary action, up to and including termination.

When we have completed our investigation, we will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation. If an employee making a complaint does not agree with its resolution, the employee may appeal to one of the individuals identified above.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual or other harassment, the policy is not designed or intended to limit our authority to



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discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual or other harassment.

Individuals who have questions or concerns about these policies should talk with CBI's General Counsel Representative referenced above.