

QM Resorts Corporation I Interval Management Harassment Policy

The Company wishes to provide a positive, discrimination - free work environment and will not tolerate harassment of our employees by anyone, including any manager, supervisor, co-worker, visitor, vendor, client or customer. The Company has zero tolerance of any type of harassment.

HARASSMENT consists of unwelcome, unsolicited conduct, whether verbal, physical, or visual, based upon a person's protected status (i.e., sex, gender-orientation, color, race, religion, national origin, age, disability, veteran status, or other protected group status). We strictly prohibit harassment that affects or otherwise interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment.

SEXUAL HARASSMENT is harassment if an employee is offended by the other person's behavior. Sexual harassment may include: practical jokes, jokes about gender-specific traits. foul or obscene language or gestures, displays of fool or obscene printed or visual material, and physical contact, such as patting, pinching, touching or brushing against another's body. Unwelcome sexual advances, propositions, sexual innuendo, suggestive comments, sexually-oriented kidding or teasing, requests for sexual favors, or other physical, verbal, or visual conduct based on sex, constitute sexual harassment when:

- Submission to the conduct is an explicit or implicit term or condition of employment
- Submission to or rejection of the conduct is used as the basis for an employment decision, or
- 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.

HOSTILE WORK ENVIROMENT may include any type of bullying, verbal abuse, screaming, making offensive and/or demeaning remarks to subordinate or co-worker, or creating intimidating or pervasive conditions in the workplace.

REPORTING HARASSMENT OR A HOSTILE WORK ENVIROMENT

If you believe you have witnessed or experienced harassment of any kind including a hostile work environment, you should report it promptly to an immediate supervisor or Human Resources. If for any reason an action seems inappropriate, report it immediately to any management representative with whom you feel comfortable. All reports of harassment or hostile work environment will be held in strict confidence and will result in a thorough investigation, the results of which will be kept confidential, if possible. If an investigation confirms that harassment or hostility has occurred, the Company will take corrective action, including termination of employment.

Any employee reporting an instance of harassment or creation of a hostile work environment will NOT be disciplined or punished. ANY employee who retaliates against an employee, who reports harassment or hostility, will be immediately terminated.

Date

Signature of employee upon Receipt of Policy