

Leap Platform Code of Conduct

Last updated: July 20, 2022

Leap and its Brand Customers require that each treat the other's personnel, customers, store shoppers, agents, and representatives (hereafter "associates") with courtesy and civility at all times. This constitutes a material condition of the business relationship between the parties. Minimum requirements for Brand's relationship with Leap are as follows.

POLICY ON NON-DISCRIMINATION

It is Leap's philosophy and policy to treat our associates fairly and without regard to race, color, sex (including pregnancy), sexual orientation, gender identity religion, national origin, age, genetic information, veteran status, or disability. Discrimination against any associate based on any of these conditions will not be allowed or tolerated. This policy applies to all workplace practices including recruiting, hiring, pay rates, training and development, promotions and other terms and conditions of employment, and termination. As to disabilities, Brand and Leap will provide reasonable accommodations to individuals with disabilities to the fullest extent required by applicable law. (For example, accommodations which would create an undue hardship or significant risk of harm would not be reasonable.) Brand and Leap pledge to engage in an interactive process to determine how individuals with disabilities might perform the essential functions of their jobs.

ANTI-HARASSMENT POLICY

I. Leap Prohibits All Forms of Harassment

In order for all employees to enjoy a work environment free from all forms of discrimination, Leap prohibits the harassment of any employee, by managers, other associates, or outside parties. It is contrary to our policy for any associate to be subjected to harassment in the workplace because of sex (including pregnancy), sexual orientation, gender identity, race, color, religion, national origin, age, genetic information, veteran status, or physical or mental disability. Harassment in the workplace negatively affects morale, motivation, and job performance. Bullying is generally known as "the tendency of individuals or groups to use persistent aggressive or unreasonable behavior against a co-worker." Harassment and bullying are inappropriate, offensive, and will not be tolerated. Brand and Leap commit to comply with this Anti-Harassment policy in all respects and as to all individuals under its control and Leap employees and associates.

II. Sexual Harassment

Leap strictly prohibits all forms of sexual harassment. No employee should be subjected to unsolicited and unwelcome sexual advances or conduct, either verbal or physical. Prohibited harassment may include, but is not necessarily limited to:

- unwelcome verbal behavior such as comments, suggestions, jokes, or derogatory remarks which are based on sex. This would include verbal innuendos, suggestive comments, off-

color jokes, discussing sexual activities, commenting on physical attributes, offensive gestures or sounds, and repeated unwelcome flirtation;

- physical behavior such as pats, squeezes, grabbing, groping, intentionally brushing against someone's body, unnecessary touching, displaying sexually suggestive pictures, or impeding or blocking normal work or movement;
- unwanted sexual advances; and/or
- pressure for sexual favors.
- Sexual harassment consists of any unwelcome behavior of a sexual nature which creates a hostile work environment. It is also sexual harassment when submission to sexual advances is a condition of a job benefit (e.g. employment, continued employment, fair treatment, promotions, etc.). Sexual harassment may also include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail); and other physical, verbal or visual conduct of a sexual nature. Sex-based harassment that is harassment not involving sexual activity or language (i.e., male manager yells only at female associates and not males), may also constitute discrimination if it is severe or pervasive and directed at associates because of their sex.

III. Other Forms of Harassment and Bullying

Leap also prohibits harassment based on race, color, religion, national origin, age, or disability or other legally protected status. Such harassment may include, but is not necessarily limited to, threats, derogatory remarks, jokes, epithets, slurs, ostracism, negative stereotyping or threatening, intimidating, or hostile acts which relate to these characteristics. It may also include offensive gestures or sounds, or displays of offensive pictures or cartoons related to any of these characteristics. Finally, it may also include physically or verbally insulting or intimidating behavior directed at persons because of such characteristics, or any other acts of incivility. **No supervisor or other member of management has the authority to suggest to any associate or applicant that his/her employment will be advanced by entering into any form of personal relationship with the supervisor or manager, and no supervisor or manager has the authority to require an associate to submit to workplace harassment.**

IV. Complaint Procedure

Any associate who believes that he or she has suffered sexual harassment or any other form of harassment or bullying should report the conduct to management as soon as possible so that prompt action may be taken. Further, any associate who is aware of any instance of harassment concerning any other associate should report the conduct to management as soon as possible. Complaints or incidents of harassment or bullying should be recorded on an "Associate Complaint Form" (sample attached) and should be reported to the People Team:

- Leap People Team, peopleteam@leapinc.co

All complaints will be investigated promptly and impartially. Within three working days of receiving a complaint, the investigators shall report the results of their investigation to the complaining party, unless additional time is needed due to unusual circumstances. If harassment or bullying is found to have occurred, the complaining party will be given the opportunity to participate in the remedial process. However, the Company will make the final decision regarding disposition of the complaint.

All complaints will be investigated in as discreet and confidential a fashion as possible. However, complete anonymity cannot be guaranteed. While Leap will take reasonable steps to maintain the confidentiality of the complaint, a fair and effective investigation may necessitate the disclosure of names of complaining parties and witnesses.

Any individual who has been found to have harassed or bullied an associate in violation of this policy will be subject to appropriate disciplinary action (such as reprimand, training, transfer, demotion, suspension, etc.), up to and including termination of employment. Violation by Brand will be deemed a material breach of contract.

V. Leap Prohibits All Forms of Retaliation

Leap strictly prohibits any form of retaliation against associates who exercise their rights to raise complaints about violations of this policy. No person will be adversely affected in their employment as a result of bringing good faith complaints of harassment or truthfully participating in an investigation. Any associate who feels that he or she has been the subject of retaliation, or adverse or different treatment as a result of having complained about prohibited discrimination or harassment, or having participated in an investigation, should immediately bring the matter to Leap's attention through this same complaint procedure.

VI. Conclusion

We trust that associates of Leap and Brand will act responsibly to maintain a pleasant working environment, free of discrimination and harassment, allowing each associate to perform to his/her maximum potential. Leap encourages any associate to bring questions he or she may have regarding sexual harassment or other types of harassment to any member of management.

Complaint Form

I hereby file a grievance concerning harassment or improper conduct. The specifics are as follows:

WHAT OCCURRED? _____

WHERE? (Location of Incident) _____

WHEN? _____

WHO WAS PRESENT? _____

IF THERE WERE ANY OTHER WITNESSES, PLEASE STATE THEIR NAMES:

Signature of Grievant

Date of Signature

(Printed)

*You may remain anonymous if you choose, but if you do so, Leap investigation will be hampered and Leap will have no way of notifying you as to the progress of results of its investigation. Please understand that Leap encourages its associates to report sexual harassment incidents and under no circumstances will an associate be retaliated against for filing a legitimate grievance as to such conduct, or acting as a supporting witness by providing truthful testimony.