

Policy Prohibiting Harassment, Discrimination, and Retaliation

Arlo is committed to creating a respectful, courteous work environment free of discrimination and harassment of any kind. Inappropriate workplace behavior and unlawful harassment create conditions that are wholly inconsistent with this commitment. The purpose of the policy set forth below is not to regulate the personal morality of employees, but rather to foster a work environment that is free from all forms of harassment or discrimination on the basis of any legally protected characteristic, including race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, military and veteran status, sexual orientation, or any other factor outlined in the Company's policies and/or protected by laws.

Scope of Policy

This policy prohibiting harassment, discrimination, and retaliatory conduct covers all employees (including, but not limited to, all supervisors and managers of the Company), applicants, paid and/or unpaid interns, volunteers, persons providing services to the Company pursuant to a contract, and other third parties over whom the Company has control (regardless of their status).

Harassment refers to behavior that is personally offensive, intimidating, or hostile, impairs morale, and interferes with work performance. We maintain a strict policy prohibiting harassment of all kinds, and we are committed to taking all reasonable steps to prevent such actions. The information contained in this policy is intended to help ensure that every employee is aware of:

- What prohibited harassment, including sexual harassment, is
- What steps to take if harassment occurs
- Protection against retaliation for reporting such harassment

Sexual Harassment Defined

The Company will not tolerate discriminatory harassment, including sexual harassment. This policy applies to all unlawful harassment occurring in the work environment, whether on Company premises or in any Company-related setting, and applies regardless of the gender of the individuals involved.

For purposes of this policy, sexual harassment is defined as any unwanted sexual advance, request for sexual favors, and other verbal or physical conduct of a sexual or gender-based nature when:

- Submission to such conduct or communication is either explicitly or implicitly made a term or condition of an individual's employment; or
- Submission to or rejection of such conduct or communication by an individual is used as a basis for employment decisions affecting such individual (e.g., transfers, advancement, benefits); or
- Such conduct or communication has the purpose or effect of interfering with an individual's work performance or creates and/or perpetuates an intimidating, hostile, or offensive work environment.

Some examples of what may constitute sexual harassment are threatening to take or taking employment actions, such as discharge, demotion or reassignment, if sexual favors are not granted; demands for sexual favors in exchange for favorable or preferential treatment; unwelcome and repeated flirtations, propositions

or advances; unwelcome physical contact; whistling; leering; improper gestures; tricks; horseplay; use of stereotypes; offensive, insulting, derogatory or degrading remarks; unwelcome comments about appearance; sexual jokes or use of sexually explicit or offensive language; gender- or sex-based pranks; and the display in the workplace of sexually suggestive objects or pictures. The above list of examples

is not intended to be all-inclusive. Sexual harassment can happen between same-sex individuals as well as between opposite-sex individuals, and does not require that the harassing conduct be motivated by sexual desire. Employees should take care in informal business situations, including the Company's functions and business trips.

Other Policy Violations Defined

For purposes of this policy, impermissible harassment or discrimination also includes any verbal, visual, or physical conduct that denigrates or shows hostility or aversion toward an individual because of their lawfully protected characteristic, and that:

- creates an intimidating, hostile or offensive work environment; or
- unreasonably interferes with an individual's work performance.

Abusive conduct and/or bullying on any protected basis is also prohibited. Some examples of such impermissible harassment or discrimination are using epithets or slurs; mocking, ridiculing or mimicking another's culture, accent, appearance or customs; threatening, intimidating or engaging in hostile or offensive acts that focus on any characteristic protected by law, including jokes or pranks; the display on walls, bulletin boards or elsewhere on Company premises, or circulation in the workplace, of written or graphic material that denigrates or shows hostility or aversion toward a person or group because of any characteristic protected by law. The above list of examples is not intended to be all-inclusive.

Consensual Relationships

Consensual romantic and/or sexual relationships between an employee with supervisory authority and any subordinate, including one not directly reporting to the supervisor, can compromise the Company's ability to enforce its policy against sexual harassment. Consequently, if such relationships arise, the Company will consider them carefully and take appropriate action. Such action may include a change in the responsibilities of the individuals involved in such relationships or transfer of location within the Company to diminish or eliminate the supervisory relationship and workplace contact that may exist. Any supervisory employee involved in such a relationship is required to report the relationship to their supervisor, and to Human Resources.

Reporting Policy Violations

We are determined to resolve possible harassment, discrimination, or retaliation situations as quickly and discreetly as possible. If you believe you are being subjected to harassment, discrimination, or retaliation in violation of this policy, or have observed or otherwise become aware of any violation of this policy, we encourage you to immediately tell your manager. Report the facts of the incident including what happened, how often, and where the incident(s) took place, as well as the names of the individuals and witnesses involved. If your manager is unavailable, or if you believe it would be inappropriate to report it to your manager, contact another company manager or the Human Resources Department. Managers will refer all harassment complaints to the Human Resources Department.

Investigation

When an employee or other covered individual reports harassment or other misconduct under this policy, then the Company will use qualified personnel to conduct a fair, impartial, timely, and thorough investigation that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. The steps of an appropriate investigation cannot be fixed in advance, but will vary depending upon the nature of the allegations. The Company will utilize appropriate documentation and tracking to ensure reasonable progress and timely closure of the investigation. The Company will

seek to maintain confidentiality throughout the investigative process to the extent possible, but cannot maintain complete confidentiality, consistent with the Company's need to comply with applicable law and to undertake a prompt, full, and thorough investigation.

Resolving the Matter

Upon completion of the investigation, the Company will resolve the complaint and take appropriate remedial measures if misconduct is found during the investigation. Remedial actions may include, but are not necessarily limited to, oral or written counseling, referral to formal counseling, disciplinary suspension or probation, and/or discharge from the Company.

We strongly encourage employees to work within the company's administrative process for complaint resolution.

Protection Against Retaliation

The Company will not tolerate any form of retaliation against any employee who reports incidents that the employee, in good faith, believes to be in violation of this policy, is involved in or participates in the investigation of a violation of this policy, opposes discrimination or prohibited harassment, files a complaint, testifies, assists, or participates in any manner in an investigation, proceeding, or hearing conducted by a state or federal agency.

Retaliation includes but is not limited to demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make impartial employment recommendations, adversely affecting working conditions, or otherwise denying any employment benefit to an individual. Retaliation is a serious violation of this policy and employees should report it immediately. The report and investigation of allegations of retaliation will follow the procedures set forth in this policy. Any person found to have retaliated against an individual for reporting discriminatory harassment or participating in an investigation of allegations of such conduct will be subject to disciplinary action, up to and including termination, as well as possible legal consequences.

Workplace Bullying

Arlo defines bullying as "repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment." Such behavior violates the Company's policies regarding conduct in the workplace.

The purpose of this policy is to communicate to all employees, including supervisors, managers and executives, that the company will not tolerate bullying behavior. Employees found in violation of this policy will be disciplined up to and including termination. Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant and will not be given consideration when meting out discipline. As in sexual harassment, it is the effect of the behavior upon the individual that is important. Arlo considers the following types of behavior examples of bullying:

- **Verbal bullying:** Slandering, ridiculing or maligning a person or their family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- **Physical bullying:** Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault; damage to a person's work area or property.
- **Gesture bullying:** Nonverbal threatening gestures or glances that convey threatening messages.

- **Exclusion:** Socially or physically excluding or disregarding a person in work-related activities. Any employee who engages in bullying will be subject to disciplinary action, up to and including termination, as well as possible legal consequences.