



NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

Cross Country is committed to providing a workplace which is free of discrimination and harassment by employees or anyone with whom we do business. This policy applies to any and all discrimination and harassment, including but not limited to that which is based on race, color, religion, sex, sexual orientation, age, origin, disability, genetic information, veteran status or any other protected characteristic as established by law. Cross Country will not tolerate verbal or physical conduct by any employee who harasses, disrupts, or interferes with another's work performance or who creates an intimidating, offensive or hostile environment.

Each Leader has a responsibility to maintain the workplace free of discrimination and any form of sexual or other harassment and all employees are responsible for respecting the rights of their co-workers. No officer, manager, supervisor or employee is to threaten or insinuate, either explicitly or implicitly, that an employee's agreement or refusal to submit to sexual advances will affect in any way the employee's employment, evaluation, wages, advancement, assigned duties or any other condition of employment or career development.

In addition, no officer, manager or supervisor is to favor in any way any applicant or employee because that person has performed or shown a willingness to perform sexual favors for that officer, manager or supervisor.

Any sexually harassing conduct directed at any employee, whether committed by management or non-management personnel, and whether occurring inside or outside the workplace, is prohibited, especially where: 1) submission to such conduct is made either explicitly or implicitly a term or condition of employment; 2) submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment; or 3) such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment.

Prohibited conduct also includes, but is not limited to, the following:

- a. Unwelcome sexual flirtations, touching, advances or propositions;
- b. Verbal abuse of a sexual or discriminatory nature;
- c. Graphic, suggestive or discriminatory comments about an individual's dress or body;
- d. Degrading words to describe an individual;
- e. The display in the workplace of sexually suggestive or discriminatory objects or pictures, including nude photographs;
- f. Communicating, creating, or accessing e-mails, voice mails, or internet-based material with sexual or discriminatory content;
- g. Offensive comments, jokes, innuendos and other sexually oriented statements.

Any employee who believes that the actions or words of an officer, manager, supervisor or fellow employee constitute harassment has a responsibility to report it as soon as possible to the appropriate manager or to the Human Resources Department. This policy applies to all incidents of alleged harassment or discrimination, including those which occur off-premises, or off-hours, where the alleged offender is a supervisor, coworker, or even a non-employee with whom the employee is involved, directly or indirectly, in a business or potential business relationship. Should the alleged harassment occur at a time other than the employee's normal business hours, the employee should report the incident as early as practicable on the first business day following the alleged incident.

After appropriate investigation, any employee, supervisor, manager or officer who is found to have engaged in harassment of another employee will be subject to appropriate disciplinary action, based on the circumstances, up to and including an unpaid suspension or termination.

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. Therefore, Cross Country strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. Cross Country will make every effort to stop alleged harassment before it becomes severe or pervasive but can only do so with the cooperation of its staff/employees.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

Complaint Procedure for Sexual or Other Harassment, Discrimination or Retaliation:

- Immediately notify your Human Resources representative if you feel that you have been subject to unlawful harassment or retaliation.

Kevin Clark, CEO of Cross Country Healthcare, Inc., will be notified if the complainant, in any of the above locations, is not satisfied with the handling of a complaint or the action taken by the above representatives, or if the subject of the complaint is an officer of the Company.

Please Remember:

- You must report your concern in writing as soon as practicable.
- The Company ordinarily will begin its investigation within one business day of receiving a complaint.
- Any employee, including managers and officers of the Company, who is found, after appropriate investigation, to have engaged in harassment of another employee, will be subjected to appropriate disciplinary action, depending on the circumstances, up to and including an unpaid suspension or termination.
- All complaints and investigations are of the highest confidentiality and will be handled as such to the maximum extent possible.
- There shall be no retaliation of any kind or adverse employment action against a complainant who makes a complaint in good faith.
- Serious workplace misconduct can lead to unpaid disciplinary suspensions of one or more full days imposed in good faith for infractions of workplace conduct rules.

All complaints of harassment will be investigated as promptly, impartially and confidentially as possible, following the Cross Country complaint procedure. All employees have a duty to cooperate with the Company with respect to any investigation. In all cases, the employee who makes the complaint is to be advised of the findings and conclusion.

IMPORTANT NOTICE TO ALL EMPLOYEES: Employees who have experienced conduct they believe is contrary to this policy have an obligation to take advantage of this complaint procedure.