

Positive Workplace Culture (Free-From Harassment)

PARTICIPATE | IMPROVE | CREATE | COLLABORATE | MODEL INTEGRITY | BE INTENTIONAL

Policy Number:	POL-201
Policy Category:	Culture & Conduct
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Related Documents:	POL-606

PURPOSE & CONTENT

Tri-Arrows Aluminum Inc. ("TAA") is committed to providing an engaging and collaborative workplace culture that is free from all forms of discrimination and conduct that could be considered harassing, coercive, or disruptive, including sexual harassment.

Scope: This policy applies to all TAA full-time, part-time, and temporary employees. Further, TAA expects all of its customers, suppliers, contractors and visitors to its facilities to behave in a manner that aligns with the terms and spirit of this policy.

This policy includes the following sections:

- 1) Policy
- 2) Discrimination, Harassment and Retaliation Are Prohibited
- 3) Sexual and Other Forms of Harassment
- 4) Bullying
- 5) Retaliation
- 6) Reporting Discrimination, Harassment & Retaliation

1) Policy

It is the policy of TAA to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, sex, national origin, sexual orientation, gender identity or expression, ancestry, age, pregnancy or related medical condition, marital or familial status, disability, veteran status, political affiliation, or genetic information in accordance with state and federal laws. TAA prohibits any such discrimination or harassment.

2) Discrimination, Harassment and Retaliation Are Prohibited.

One of TAA's highest priorities is attracting and retaining qualified and collaborative team members. TAA bases all employment decisions (e.g., recruiting, employment, transfers, promotions, corrective actions, and terminations) on TAA's needs and the individuals'

qualifications, ability, and past performance. The Company prohibits all forms of unlawful discrimination, harassment, and retaliation.

TAA cannot, however, take action to prevent or remedy a violation of this policy unless it is aware of the violation. If you believe, in good faith, that you have witnessed or experienced a violation of this policy, you shall report it immediately. See Section 6, *Reporting Discrimination, Harassment, and Retaliation*, for additional information and guidance. TAA prohibits and will not tolerate retaliation against someone for their making a good faith report of any violation, or potential violation, of this policy.

Similarly, employees should exercise common sense and understand no one is perfect. If someone unintentionally says or does some relatively minor thing you find personally offensive (e.g., accidentally bumps into you or uses a common word you find personally offensive), please tell them that you were offended and give them a chance to apologize before assuming they intended to violate this policy.

This policy cannot be used “as a shield” to avoid lawful evaluation, criticism, discipline, or termination of an employee based on the employee’s conduct, work performance, attitude, attendance, qualifications, or similar criteria. This policy is not intended, and will not be interpreted, to interfere with, restrain, or coerce employees’ lawful exercise of their protected rights under the National Labor Relations Act.

3) Sexual and Other Forms of Harassment

Employees are expected to treat one another with courtesy, respect, and professionalism during work time and in work areas. TAA will not tolerate verbal or physical conduct that has the purpose or effect of creating an objectively hostile, intimidating, or offensive work environment or that unreasonably interferes with or disrupts another employee’s work performance. TAA expressly prohibits such conduct, particularly when it is based on or motivated by a person’s race, color, religion, sex, national origin, disability, age (40 or older), genetic information, or any other characteristic protected by applicable state or federal laws. Unwelcome and/or other harassing conduct based on or motivated by factors not protected by law (such as favorite sports team, school attended, political opinions, etc.) also is prohibited.

These prohibitions apply even when employees are off-duty and/or off-premises. Employees who engage in prohibited conduct, no matter when or where, may be disciplined or terminated for such conduct. Examples of prohibited conduct include, without limitation:

- persistently or harshly antagonizing, annoying, attacking, criticizing, or interfering with a person (ex. ridiculing a person so often or so harshly it interferes with their ability to concentrate on their work);
- making frequent or harsh demeaning, insulting, intimidating, or provocative comments to or about a person or group (ex. derogatory comments about someone’s mother or ethnic group);

- using offensive epithets, slurs, innuendo, gestures, symbols, or items regarding or negatively associated with a protected characteristic (ex. racial slurs);
- making jokes or remarks or otherwise perpetuating negative stereotypes regarding or negatively associated with a protected characteristic (ex. making disparaging jokes regarding a religion or nationality); or
- distributing, displaying, or discussing written or graphic material that ridicules, denigrates, insults, belittles, or shows hostility or aversion regarding a protected characteristic (ex. images of lynching, swastikas, nude images, etc.).

Nothing in this policy is intended or shall be construed to prohibit concerted activity protected under the National Labor Relations Act (such as objecting to terms and conditions of employment).

Sexual harassment is a special type of unlawful harassment and is prohibited by a variety of state and federal laws, and by this policy. All employees must be allowed the opportunity to work in an environment that is free from unwelcome sexual conduct. TAA will not tolerate sexual harassment of any employee by co-workers, supervisors, managers, or third parties encountered in the course of their duties.

TAA prohibits unwelcome sexual conduct even if the conduct does not rise to the level of unlawful sexual harassment (e.g., telling one “dirty” joke typically would not constitute unlawful sexual harassment, but it is prohibited by this policy). TAA prohibits unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature if:

- submission to the conduct is an explicit or implicit term or condition of employment; or submission to, or rejection of, the conduct is used as a basis for an employment decision affecting the person who rejected or submitted to the conduct; or
- the conduct has the purpose or effect of interfering with an employee’s work performance or creating an intimidating, hostile, or offensive work environment.

The Company also prohibits:

- Unwelcome and/or offensive sexual innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks, and threats.
- Requests for any type of sexual favor (ex. repeated, unwelcome requests for dates).
- Verbal abuse or “kidding” of a sexual nature.
- Distribution, display (i.e. others can see it), or discussion of written or graphic material that is sexually suggestive or shows hostility toward an individual or group based on sex (including, without limitation, sexual images or content in letters, notes, e-mail, text messages, etc.).
- Suggestive or insulting sounds, leering, staring, whistling, obscene gestures, etc.; and unwelcome or unwanted physical contact including, without limitation, touching, tickling,

pinching, patting, intentionally brushing against, hugging, cornering, kissing, fondling, forced sexual contact, intercourse, and assault.

This policy is not intended to prohibit occasional, appropriate compliments and other normal, courteous, respectful conduct of a socially acceptable nature. This policy cannot be used "as a shield" to avoid lawful evaluation and criticism of an employee based on his or her work performance, attitude, attendance, qualifications, or similar criteria.

If you believe, in good faith, that you have witnessed or experienced any form of prohibited harassment, you shall report it immediately. See Section 6, *Reporting Discrimination, Harassment and Retaliation*, for additional information and guidance.

4) Bullying in the Workplace

TAA 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. All team members should be treated with respect and dignity and behavior that contradicts this is unacceptable.

TAA will not tolerate abusive conduct or bullying behavior. Employees found to be in violation of this policy will be disciplined, up to and including termination.

Bullying may be intentional or unintentional; however, as is the case with harassment and/or discrimination, it is the effect of the behavior on the individual that is important. TAA considers the following types of behavior as bullying:

- **Verbal bullying:** Slander, ridiculing, or maligning a person or his or her 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; glances that can convey threatening messages.
- **Exclusion:** Socially or physically excluding or disregarding a person in work-related activities.

Although not comprehensive, the following examples may constitute or contribute to evidence of bullying in the workplace:

- Persistent singling out of one person.
- Shouting or raising voice at an individual in public or in private.
- Not allowing the person to speak or express themselves (i.e. ignoring or interrupting).

- Personal insults and/or use of offensive nicknames.
- Public humiliation in any form including reprimands.
- Spreading rumors and gossip regarding individuals.
- Manipulating the ability of someone to do his or her work (ex. overloading, under loading, withholding information, setting deadlines that cannot be met and/or deliberately providing ambiguous instructions).
- Taking credit for another person's ideas.
- Deliberately excluding an individual or isolating them from work-related activities.

Employees who believe they have experienced or witnessed bullying in the workplace shall report it immediately to a supervisor. If the supervisor is unavailable or it would be inappropriate to contact that supervisor, employees shall immediately contact and report the incident to Human Resources. Employees can raise concerns and make good faith reports without fear of reprisal or retaliation.

Disregarding or failing to comply with this policy could lead to disciplinary action, up to and including termination of employment.

5) Retaliation

TAA will not tolerate retaliation against an employee for reporting any type of unlawful discrimination, harassment, or other inappropriate behavior. If you sincerely believe that you have witnessed or experienced such retaliation, you shall report it immediately. See Section 6, *Reporting Discrimination, Harassment, and Retaliation*, for additional information and guidance.

6) Reporting Discrimination, Harassment, and Retaliation

If you see something, say something. If you sincerely believe that you have witnessed or experienced unlawful discrimination, harassment, or retaliation, you should tell the person(s) engaging in such behavior that their conduct is inappropriate and must stop. If you are uncomfortable communicating directly with the person(s) whose conduct is offensive, or if direct communication has proven unsuccessful, you may skip this step. Additionally, you should report the offensive conduct to your supervisor. If this involves your supervisor, report the conduct directly to a member of the Human Resources team. Supervisors who witness what may be a violation of TAA's policies prohibiting discrimination, harassment, or retaliation, or who receive an employee's report of a violation of any such policy, shall promptly report it to the Human Resources Department or to the TAA, Whistleblower Hotline @ 1-855-662-SAFE.

TAA will timely and thoroughly investigate all alleged violations. Employees will not be retaliated against for providing truthful information during an investigation, but may be

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disciplined or terminated for false reporting, dishonesty, or unreasonably failing to cooperate in an investigation. If, in TAA's judgment, it appears more likely than not a policy violation has occurred, TAA will take appropriate remedial action.

Please reach out to a member of the Human Resources team if you have a question about this policy.

As is the case with all policies, TAA has the exclusive right to interpret or modify this policy at any time, in its sole discretion.