

**UNLAWFUL HARASSMENT POLICY STATEMENT
AND COMPLAINT PROCEDURE**

POLICY STATEMENT

Sevenson Environmental's policy is to maintain a working environment free from intimidation, harassment, and discrimination. In keeping with this policy, Sevenson will not tolerate harassment of any of its employees by anyone including any supervisor, co-worker, vendor, client, or customer of the company.

Harassment consists of unwelcome conduct, whether verbal, physical, or visual, that is based on a person's protected status, such as race, religion, color, national origin, sex, age, status as protected veterans and individuals with disabilities, or other protected group status. Sevenson Environmental will also not tolerate harassing conduct that affects tangible job benefits, that can interfere unreasonably with an individual's work performance, or that which creates an intimidating, hostile, or offensive working environment. Actions, words, jokes, or comments based on an individual's sex, race, ethnicity, age, religion, or any other protected characteristic are prohibited and will not be tolerated.

Sexual harassment deserves special attention. This policy prohibits any form of sexual harassment among employees, including unwanted or unwelcome sexual advances or harassment that may affect an employee's working environment. Examples of sexual harassment include, but are not limited to, unwanted sexual advances; demands for sexual favors in exchange for favorable treatment or continued employment; repeated sexual jokes, flirtations, advances or propositions; verbal abuse of a sexual nature; graphic, verbal commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling, touching, pinching, assault coerced sexual acts or suggestive, insulting, obscene or demeaning comments or gestures; display in the workplace of sexually suggestive objects or pictures.

All employees must strictly observe this policy and require employees under their supervision to do likewise. No employee who lodges a complaint or assists in the investigation of a complaint, such as by providing corroboration, will be discriminated, or retaliated against.

COMPLAINT PROCEDURE

Whenever an employee has reason to believe that he/she has been subjected to any discriminatory treatment or unwanted or unwelcome harassment or feels oppressed by an offensive working environment, the employee should promptly report such incidents or conditions to his/her supervisor or to the Company's Human Resources Department or directly to an officer or other official of the Company. All complaints will be heard and investigated. Where warranted, appropriate disciplinary action will be taken against employees who violate this policy.

The following procedures apply to complaints of harassment. These procedures will be carried out by the supervisor, EEO Officer, or other Company official who receives the complaint (investigating official):

- 1) The investigating official will meet promptly with the employee who feels that he/she is the victim of harassment. The investigation official will hear the complaint and make any necessary further investigation. The investigating official will take such action or make such recommendations as he/she deems appropriate to carry out the Company's policy.
- 2) The complaining employee will be advised of the findings and the action taken or proposed to be taken.

If a complaining employee is not satisfied with the result of the investigation or with the action proposed or taken, the employee may bring the complaint to the next higher level of management or request the appointment of an ombudsman. The ombudsman may be any person, including any other employee or official of the Company, who is acceptable to both the employee and Company and who is willing to attempt to conciliate the complaint.

Any questions concerning this policy or complaint procedure may be directed to:

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