



**POLICY AGAINST HARASSMENT  
ALL EMPLOYEES**

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RUSSO CORPORATION is committed to providing a workplace free of sexual harassment, intimidation, threats, coercion or discrimination (which includes harassment based on race, color, creed, gender, sexual orientation, gender identity, national origin, pregnancy, childbirth, age, disability, any type of veteran status, genetic information, or related medical conditions) as well as harassment, intimidation, threats, coercion or discrimination based on such factors as race, color, sex, sexual orientation, gender identity, religion, national origin, ancestry, age, physical disability, mental disability, medical condition, marital status, family care leave status, or veteran status. RUSSO CORPORATION strongly disapproves of and will not tolerate harassment of employees by managers, supervisors or coworkers. Similarly, RUSSO CORPORATION will not tolerate harassment by its employees of non-employees with whom RUSSO CORPORATION has a business, service, or professional relationship.

Harassment includes verbal, physical, and visual conduct that creates an intimidating, offensive, or hostile working environment or that interferes with work performance. Such conduct constitutes harassment when (1) submission to the conduct is made either an explicit or implicit condition of employment; (2) submission to or rejection of the conduct is used as the basis for an employment decision; or (3) the harassment interferes with an employee's work performance or creates an intimidating, hostile, or offensive work environment.

Harassing conduct can take many forms and includes, but is not limited to, slurs, jokes, statements, gestures, pictures, or cartoons regarding an employee's sex, race, color, national origin, religion, age, physical disability, mental disability, medical condition, ancestry, marital status, family care leave status or veteran status.

Sexually harassing conduct in particular includes all of these prohibited actions as well as other unwelcome conduct such as requests for sexual favors, conversation containing sexual comments, and unwelcome sexual advances.

You should report any incident of harassment, including work-related harassment by any RUSSO CORPORATION personnel or any other person, promptly to your supervisor or manager (or to any member of management) and to Tim Bozeman, the Equal Employment Opportunity (EEO) Officer at (205) 923-4434, who is responsible for investigating the matter. Managers who receive complaints or who observe harassing conduct should inform the EEO Officer immediately. RUSSO CORPORATION emphasizes that you are not required to complain first to your supervisor if your supervisor is the individual who is harassing you.

Every reported complaint of harassment will be looked at. All investigations will be thorough, prompt, and confidential. In addition, RUSSO CORPORATION will not tolerate retaliation against any employee for cooperating in an investigation or for making a complaint to the EEO Officer or to any other manager.

In the case of RUSSO CORPORATION employees, if harassment is established, RUSSO CORPORATION will discipline the offender. Disciplinary action for a violation of this policy can range from verbal or written warnings up to and including immediate termination, depending upon the circumstances.

Harassment and retaliation for opposing harassment or participating in investigations of harassment are illegal if the harassment is based on a legally protected status (for example, such as sex or disability). In addition to notifying RUSSO CORPORATION about harassment or retaliation complaints, you may also direct your complaint to the state and/or federal fair employment practices commissions such as the Equal Employment Opportunity Commission and the United States Department of Labor's Office of Federal Contract Compliance Programs (OFCCP). Both the state fair employment practices commissions and the courts have the authority to award monetary and non-monetary relief in meritorious cases. The EEOC and OFCCP are listed under state and federal government listings in the local telephone directory.

January 1, 2020