

## Anti-Harassment, Anti-Bullying & Workplace Violence Policy

### POLICY

Texarkana Aluminum is committed to providing a workplace free of discrimination, harassment, which also includes sexual harassment, workplace violence and workplace bullying. Texarkana Aluminum strongly disapproves of and will not tolerate discrimination, harassment, violence or bullying of applicants, employees, unpaid interns, or volunteers by managers, supervisors, or co-workers. Similarly, Texarkana Aluminum will not tolerate discrimination, harassment, violence or bullying by its employees of non-employees with whom Texarkana Aluminum employees have a business, service, or professional relationship. Texarkana Aluminum also will attempt to protect employees from harassment by non-employees in the workplace.

Texarkana Aluminum will not tolerate retaliation against any employee for making a good faith complaint of harassment or for cooperating in an investigation. All complaints of discrimination, harassment, violence or bullying will be investigated thoroughly and promptly. The investigation will be handled in as confidential a manner as possible consistent with a full, fair, and proper investigation. If discrimination harassment or retaliation in violation of this policy is established, Texarkana Aluminum will take corrective action.

Texarkana Aluminum understands that victims of are often embarrassed and reluctant to report acts of discrimination, harassment, violence or bullying for fear of being blamed, or retaliated against, or because it is difficult to discuss sexual matters openly with others. However, no employee should have to endure prohibited conduct, and Texarkana Aluminum therefore encourages them to promptly report any incidents of harassment so that corrective action may be taken.

No retaliation of any kind will be permitted against anyone because of their good faith reports or a complaint of discrimination, harassment, sexual harassment, workplace violence, or workplace bullying, or who provides information during an investigation of these matters. They are protected from retaliation even if their complaints are proven unfounded by an investigation. However, if a person, knowingly make a false allegation, or who provide false or misleading information in the course of an investigation, or who otherwise act in bad faith, Texarkana Aluminum will take appropriate action.

If there is a need to report of discrimination, harassment, sexual harassment, workplace violence, or workplace bullying, whether the person is a victim of any of these prohibited conducts, or the witness of these prohibited conducts, they should immediately report this to their supervisor, manager, department manager, plant manager, or vice president. If for any reason they do not feel comfortable reporting their concern to one of these people, they may submit their concern to [HR@TACHEN.COM](mailto:HR@TACHEN.COM) and the concerns will be reviewed by the Corporate Vice President of HR and appropriate action will be initiated.

*NOTE: The following policies and related statements in this section are taken directly from the TKA Handbook, Section 2 Employment Policies distributed to all internal and distributed to all TKA personnel during onboarding at employment commencement.*

### GOVERNANCE AND ACCOUNTABILITY

Plant leadership is accountable for implementation and resourcing.