

<u>HARASSMENT POLICY</u>	Document No: 304-055-UC
	Revision Date: 01/08/2015
	Revision No: 5
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Approved by: M. M. Comerford & J. C. Neel	
Prepared By: J. D. Patterson	

I. Scope

All employees of Haynes International, Inc. are covered by this policy.

II. Purpose

It is the goal of Haynes International, Inc. to provide a work environment free from harassment of any type by ensuring that all employees are treated with mutual consideration and respect. It is not the purpose of this policy to intrude upon the personal lives of our employees or to interfere in acceptable social relationships. However, harassment based on sex (with or without sexual conduct), race, color, religion, national origin, age, disability, veteran status, and protected activity have absolutely no place at Haynes International, Inc. and will not be tolerated.

III. Policy

A. Harassing conduct includes, but is not limited to:

1. Epithets; slurs; negative stereotyping; or threatening, intimidating or hostile acts; which relate to race, color, religion, gender, national origin, age, sexual preference, disability, or veteran status.
2. Written or graphic material that defames or shows hostility or aversion toward an individual or group because of race, color, religion, gender, national origin, age, sexual preference, disability, or veteran status, and that is placed on walls, bulletin boards, or elsewhere on the Company's premises, or that is circulated in the workplace.

B. Sexual harassment does not mean occasional compliments of a socially acceptable nature. However, sexual harassment does include, but is not limited to:

1. Sex-oriented verbal "kidding" or abuse;
2. Possession, display, or distribution of photographs, drawings, objects, or graffiti of a sexual nature;
3. Subtle pressure for sexual activity; physical conduct such as patting, pinching or constant brushing against another's body; explicit demands for sexual favors, whether or not accompanied by implied or overt promises of preferential treatment or threats concerning an individual's employment status; offensive sexual flirtations, advances or propositions; and any other offensive, hostile, intimidating, or abusive conduct of a sexual nature.

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IV. Procedure

A. Employees are to immediately report harassment and other inappropriate conduct before it becomes severe or pervasive. While not all incidents of harassment violate the law, we intend to prevent and correct harassment and other inappropriate conduct before it rises to the level of a violation of the law¹.

B. Employees shall direct their complaint to their Department Supervisor/Manager, to management within their local Human Resources Department, or to any member of management with whom the employee feels comfortable. In the alternative, employees may report harassment or other inappropriate conduct using EthicsPoint, an independent third party, through the Company's intranet or by calling EthicsPoint at 1-866-294-9323 or going to www.ethicspoint.com.

C. In all cases where a supervisor or other member of management is advised of any alleged violation of this Policy, or if he/she independently observes conduct which may be prohibited by this Policy, the Supervisor/Manager is to immediately report the complaint to management within their local Human Resources Department, the corporate Senior Human Resources Manager, or to a high ranking official of Haynes International, Inc.

D. Haynes International, Inc. has adopted a complaint procedure that assures a prompt, thorough, and impartial investigation of all complaints, followed by swift and appropriate corrective action where warranted.

E. The complaint and information collected during such an investigation will be kept confidential to the extent possible and will not be disclosed unnecessarily or to persons not involved directly in conducting the investigation and determining what action, if any, to take in response to the complaint. Complete confidentiality cannot be guaranteed because an effective investigation usually requires revealing certain information to the alleged harasser and potential witnesses.

F. If, following a complaint of sexual or other harassment, an investigation reveals that some act of sexual or other harassment, or other inappropriate conduct or behavior, has occurred, prompt and appropriate corrective action will be taken. The parties will be informed of the Company's determination.

¹ While employees are encouraged to file complaints of harassment with the company before filing a charge of unlawful harassment with the Equal Employment Opportunity commission or the state/local Fair Employment Practices agency, there is no obligation to exhaust the Company's internal procedures. Employees should keep in mind that there is a deadline for filing such a charge with the government, which runs generally from the time the harassment, occurred. An employee with a question about the applicable deadline for filing an external charge should directly contact the EEOC and/or state/local Fair Employment Practices agency.

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G. If no determination can be made because the evidence is inconclusive, the parties will be informed of this result and the preventive measures that will be undertaken, such as training or monitoring.

H. The employee who engaged in such conduct or behavior will be subject to sanctions or penalties, up to and including suspension and/or immediate termination of employment.

I. No employee will be subject to adverse treatment or retaliation because they report harassment or provide information concerning such reports.

J. If the offender is not an employee of Haynes International, Inc., we will take reasonable measures to the extent we can exercise any control over the problem.

V. **Accountability**

The Supervisor/Manager is accountable for the consistent application of this policy within a department. The corporate Senior Human Resources Manager is accountable for the consistent application of this policy throughout the organization. Any deviation from the above procedure requires the prior approval of the Vice President of Corporate Affairs.

VI. **Definitions**

Employee: An individual currently employed by Haynes International, Inc., such as officers, members of management, staff personnel, bargaining unit personnel, etc.

Harassment: Verbal or physical conduct defaming or showing hostility toward an individual because of his or her race, color, religion, gender, national origin, age, sexual preference, or disability or that of the individual's relatives, friends, or associates, creates or is intended to create an intimidating, hostile, or offensive working environment; interferes or is intended to interfere with an individual's work performance; or otherwise adversely affects an individual's employment opportunities.

Non-employee: An individual not directly employed by Haynes International, Inc., such as customers, clients, delivery personnel, retirees, staff from temporary agencies, vendors, or others with whom Haynes International, Inc. has a relationship with.

Protected Activity: Opposition to prohibited discrimination or participation in the statutory complaint process.

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Sexual Harassment: Unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature, where:

1. Submission to such conduct is made either explicitly or implicitly as a term or condition of employment.
2. Submission to or rejection of such conduct is used as the basis for employment decisions.
3. Such conduct interferes with work performance or creates an intimidating, hostile, or offensive working environment.