

# OLYMPIC STEEL

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## Anti-Harassment & Non-Discrimination Policy

It is Olympic Steel's policy that all employees have a right to work in an environment free from sexual or other unlawful harassment, intimidation, threats, coercion, retaliation, or discrimination based on such factors as race, color, religion, sex, pregnancy, gender identity, sexual orientation, genetic information, national origin, ancestry, marital status, age, military or veteran status, disability or other status protected by applicable law. In some cases, local laws and regulations may provide greater protections than those outlined here. Employees will be covered by the governing laws of their locality.

Unlawful harassment includes, but is not limited to, unwelcome verbal, physical and visual conduct that creates an intimidating, offensive or hostile work environment.

Specifically, it is improper and against Company policy for any employee, including a supervisor, male or female, to sexually or otherwise harass another employee by: (a) making participation in sexual conduct a condition of continued employment; (b) making submission to or rejection of such conduct the basis for an employment decision; or (c) creating an intimidating, hostile or offensive work environment. Similarly, Olympic Steel will not tolerate harassment by or toward any third party with whom the Company has a business, service or professional relationship.

### Reporting Discrimination or Harassment

Any employee who believes he or she has been the subject of unlawful discrimination, retaliation or harassment must promptly report the incident to his or her immediate supervisor and/or the Human Resources Help Desk. In the event that the immediate supervisor is the alleged wrongdoer or the employee is otherwise uncomfortable reporting to his/her supervisor, the employee is to report the incident to the Human Resources Help Desk. The Company requires all unlawful discrimination, retaliation and harassment claims be reported, regardless of whether the person engaging in such conduct is a co-worker, a supervisor or a high-level manager. The failure to promptly report an incident impedes the Company's ability to take immediate and appropriate investigative and corrective action.

The Company will promptly investigate every complaint of unlawful discrimination, retaliation or harassment and, to the extent practicable, will do so in a confidential manner. However, complete confidentiality cannot be guaranteed where the disclosure of certain facts may be necessary to complete the Company's investigation into the complained of conduct in question. The Company will not tolerate retaliation against any employee for reporting, in good faith, any violation of this policy or for cooperating in an investigation. However, employees who knowingly make false claims of discrimination, retaliation or harassment may be subject to disciplinary action for abuse of the reporting system.

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Any employee who, after appropriate investigation, has been found by the Company to have participated in unlawful discrimination, retaliation or harassment will be subject to prompt disciplinary action, up to and including termination of employment.

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