



Anti-Harassment Policy

Flintco, LLC and its subsidiaries ("The Company") is committed to a workplace that is free of discrimination and harassment based on race, color, religion, age, sex, national origin, disability or any other basis protected by federal, state or local laws. In an effort to prevent such illegal harassment or discrimination from occurring, it is the responsibility of all levels of management to assure that Company employees are informed of this policy in writing and all employees are required to strictly adhere to this policy while on Company property.

Examples of Misconduct

Discrimination or harassment based on race, color, religion, gender, age, national origin, sexual preference, disability, veteran status, physical impairment or any other protected classification is considered a form of employee misconduct. Examples of such misconduct may include, but are not limited to:

- A request or demand for sexual favors accompanied by a threat concerning an individual's employment status or a promise of preferential treatment;
- Unnecessary and unwelcome touching of an individual, for example, patting, pinching, hugging or repeatedly brushing against another individual's body; or
- Offensive jokes, comments, slurs, e-mail, memos, faxes, posters, cartoons or gestures.

Disciplinary action, up to and including termination may be taken against any employee engaging in this type of behavior. Disciplinary action may also be taken against any employee who in bad faith makes a false or dishonest claim of harassment or discrimination. Any supervisor or manager who has knowledge of such behavior yet fails to take appropriate action is also subject to discipline.

Any person not a company employee who sexually harasses another person on company premises may be immediately removed from the company premises. After investigation, should the accused be found guilty within reasonable doubt of the alleged charge, he or she may be barred from the project(s) permanently.

Reporting Complaints

Any employee who believes that they are being discriminated against or harassed based on any of the grounds stated above should report it immediately to their direct supervisor, or to Tony DeStefano, Vice President of Human Resources in Austin, Texas. The Company will investigate the complaint, and may make a written determination of its conclusion and when appropriate, prepare a plan of action to correct the problem and prevent reoccurrence.

Non-Retaliation

Anyone who believes that they have been the victim of or has witnessed any act of discrimination or sexual harassment against another person is obligated to report this fact immediately to their direct supervisor, any company manager or officer or, to Tony DeStefano, Vice President of Human Resources in Austin, Texas, without fear of reprisal.

Under no circumstances will an employee be penalized for reporting what the employee believes in good faith to be harassment under this policy. If you believe that you are being retaliated against for bringing a complaint of harassment or discrimination, you should report such conduct immediately to either your direct supervisor or to Tony DeStefano, Vice President of Human Resources in Austin, Texas. Any supervisor or manager who retaliates against an employee for making a complaint may be subject to disciplinary action up to and including termination.

Tony DeStefano is the Equal Employment Opportunity Officer for Flintco, LLC and is responsible for all complaints. Mr. DeStefano may be reached at Flintco, LLC Austin office, 8100 Cross Park Drive, Austin, TX 78754, telephone number (512) 822-7445, or e-mail tony.destefano@flintco.com.

Steve Eikanger, President/CEO