

 DW TOWER, INC.	ADMINISTRATIVE		
	POLICIES AND PROCEDURES		
SUBJECT	ISSUED	REVISED	NO.
Anti-Discrimination and Harassment Policy	03/01/2007		A-101
APPROVED <i>Approved with Policy A-100</i> President			

Purpose: D. W. Tower, Inc. is committed to maintaining a work environment that is free of discrimination.

Scope: All employees of D. W. Tower, Inc.

Policy: In keeping with our commitment of a discrimination-free work environment, we will not tolerate unlawful harassment of our employees by anyone, including any supervisor, co-worker, or third party. Harassment consists of unwelcome conduct, whether verbal, physical or visual, that is based on a person's race, color, national origin, religion, age, sex, or disability. Harassment that affects job benefits, interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment will not be tolerated.

Definitions:

Harassment may include derogatory remarks, epithets, offensive jokes, the display or circulation of offensive printed, visual or electronic, or offensive physical actions. Sexual harassment deserves special mention. Unwelcome sexual advances, requests for sexual favors, or other physical, verbal or visual conduct based on sex constitutes harassment when (1) submission to the conduct is required as a term or condition of employment or is the basis for employment action, or (2) the conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive workplace. Sexual harassment may include sexual propositions, innuendo, suggestive comments, sexually oriented jokes or teasing, or unwelcome physical contact such as patting, pinching, or brushing against another.

Procedures:

1. All D. W. Tower, Inc. employees are responsible for helping to enforce this policy against harassment. Any employee who has been the victim of prohibited

- harassment or who has witnessed such harassment must immediately notify their supervisor **in writing** so the situation can be promptly investigated and remedied.
2. If it is the supervisor who is responsible for the harassment or reporting the situation to the supervisor fails to remedy the situation, complaints of harassment must immediately be reported to Human Resources or the Owner.
 3. It is D. W. Tower, Inc.'s policy to investigate all harassment complaints thoroughly and promptly. To the fullest extent practicable, D. W. Tower, Inc. will maintain the confidentiality of those involved.
 4. If an investigation confirms that harassment has occurred, the Company will take corrective action. Corrective action may include discipline up to and including immediate termination of employment.
 5. D. W. Tower, Inc. forbids retaliation against anyone who has reported harassment or who has cooperated in the investigation of harassment complaints.

Anyone found violating any portion of this policy may be subject to disciplinary procedures, up to and including termination.

This manual and the policies herein are the property of D. W. Tower, Inc. They may be altered or deleted only with the permission of the President.