

Equal Employment Opportunity Policy

Policy

It is the continuing policy of 84 Lumber Company (hereinafter referred to as "84") to afford full equal employment opportunity to qualified employees (hereinafter referred to as "Associate") and applicants regardless of their race, color, religion, sex, national origin, age, disability, sexual orientation, military veteran status, genetic information, or any other basis protected by federal, state or local law. This policy is founded upon 84's belief that all Associates and applicants have the inherent right to work in an environment free from all forms of discrimination and conduct which can be considered harassing, coercive or disruptive.

In addition, as a federal contractor or subcontractor, 84 is subject to Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, and the Veterans Employment Opportunity Act of 1998 and, in accord with the mandates of these federal laws, has developed and maintains written Affirmative Action Programs for females, minorities, individuals with disabilities, and covered veterans. These programs are designed to ensure equal employment opportunity, and 84 is committed to their success and to employing and advancing in employment qualified females, minorities, individuals with disabilities, and covered veterans at all levels of employment.

It is also 84's position that sexual harassment and other unlawful harassment is a form of misconduct that undermines the integrity of the employment relationship. Accordingly, no Associate – either male or female – should be subject to harassment, either verbal or physical. Discrimination or harassment is strictly forbidden and shall be a basis for disciplinary action, up to and including discharge.

Reporting an Incident

Any Associate or applicant who believes that he or she has been the subject of discrimination or harassment must promptly report the alleged incident to their Manager or 84's Human Resources Department. All complaints of discrimination and/or harassment must be promptly reported. A confidential and impartial investigation of the alleged act of discrimination or harassment will be promptly undertaken. If it is found that the alleged act of discrimination or harassment did occur, prompt corrective action, including discipline up to and including discharge, will be taken against all responsible supervisory and non-supervisory Associates. No person complaining of discrimination or harassment or assisting in the investigation of alleged discrimination or harassment will be subjected to retribution or retaliation. However, accusations, that are not based on a good faith belief that a violation occurred, will be treated as a disciplinary offense.

Prohibited Conduct

Discrimination or harassment because of an Associate's or applicant's race, religion, sex, national origin, age, disability, sexual orientation, military/veteran status, genetic information, or other protected characteristic by any supervisory or non-supervisory Associate, customer, independent contractor, vendor or supplier is prohibited conduct.

One form of prohibited discrimination is harassment. Prohibited harassment includes but is not limited to:

- verbal conduct such as epithets, derogatory comments, slurs, or unwanted sexual advances, invitations, or comments;
- visual conduct such as derogatory posters, photography, cartoons, drawings, or gestures;
- physical conduct such as unwanted touching, blocking normal movement, or interfering with work directed at you because of your sex or any other protected basis;

- threats and demands to submit to sexual requests in order to keep your job or avoid some other loss, and offers of job benefits in return for sexual favors;
- retaliation for opposing, reporting or threatening to report harassment, or for participating in an investigation, proceeding or hearing conducted by an investigating agency.

Prohibited harassment is not necessarily limited to the loss of a job or some other economic benefit. Prohibited harassment that impairs your working ability or emotional well-being at work violates this policy and will not be tolerated.

Disability Accommodation

Reasonable accommodation will be provided to individuals with a known physical or mental disability if such accommodation would not impose an undue hardship on 84, and would enable the individual to apply for, or perform, the essential functions of the position in question.

Any applicant or employee who requires an accommodation in order to perform the essential functions of the job should notify his or her Manager or 84's VP of Human Resources and request such an accommodation. 84 will then identify possible accommodations, if any, that will help to eliminate the limitation or barrier. If the accommodation is reasonable, will not impose an undue hardship, and will not pose a direct threat to the health and/or safety of the individual or others, 84 will make the accommodation. The individual is required to fully cooperate with 84 in seeking and evaluating alternatives and accommodations. 84 may require medical verification of both the disability and the need for accommodation.

Religious Accommodation

84 will attempt to make reasonable accommodations for employee observance of religious holidays and sincerely held religious beliefs unless doing so would cause an undue hardship on 84 operations. If you desire a religious accommodation, you are required to make the request in writing to your Manager or the VP of Human Resources as far in advance as possible.

Prohibition Against Retaliation

Applicable law and 84 policy prohibit retaliation against any Associate by another Associate or by the Company for reporting, filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by the Company or a federal or state enforcement agency. Please report any retaliation to your Manager or Human Resources. Any report of retaliatory conduct will be immediately and objectively investigated in accordance with the Company's investigation procedure outlined above. If a report of retaliation is substantiated, appropriate disciplinary action, up to and including discharge, will be taken.

Scope

The personal support of this policy from each supervisory and non-supervisory Associate is required and is necessary to maintain at 84 an environment free from discrimination or harassment because of an Associate's or applicant's race, religion, sex, national origin, age, disability, sexual orientation, veteran status, genetic information, or other protected characteristics. The policy also applies to customers, independent contractors, vendors and suppliers.