

SEXUAL HARASSMENT POLICY STATEMENT

The purpose of this policy is to reaffirm Barrett Industries Corporation, Subsidiaries, and our Affiliates' policy and commitment to a work environment free from discrimination, including freedom from sexual harassment for all employees. The company strongly disapproves of all forms of sexual harassment, and any violation of this policy by any employee, including supervisory employees, will result in discharge or other disciplinary action.

Specifically, no supervisor shall threaten or insinuate, either explicitly or implicitly, that any employee's submission to, or rejection of, sexual advances will in any way affect that employee's employment, wages, promotional opportunities, evaluations, work assignments, or any other conditions of employment. Moreover, other sexually harassing or offensive conduct or conditions in the workplace are also prohibited on the part of all employees. This includes sexual advances and propositions, abuse of a sexual nature, graphic verbal commentary about a person's body, sexually suggestive objects or pictures. Sexual harassment may also include harassment where the harasser is not an employee of our company, but is a customer, vendor, contractor or member of the general public.

Employees who believe that they have been subjected to sexual harassment are urged to report it to the Corporate Vice President of Human Resources, Jeff Koenig at (973) 533-1021, or the Corporate Human Resources Manager, Jennifer Canare at (973) 533-1010, or to your Regional Manager or local EEO Officer. All complaints will be investigated thoroughly and objectively. Whenever an investigation confirms that this policy has been violated, appropriate action will be taken promptly.

Employees who express complaints of sexual harassment will be protected against retaliation, and in so far as this is possible, their complaints will be treated confidentially. On the other hand, employees are cautioned against making false accusations of sexual harassment.

A handwritten signature in black ink, appearing to read "Jeff Koenig", written over a horizontal line.

Jeff Koenig
Vice President Human Resources