



## **I. Purpose**

It is the intent of Boise Cascade to (1) provide equal employment opportunities to all job applicants and employees; (2) administer recruiting, hiring, compensation and benefits practices, training, upgrading and promotion procedures, transfers, and terminations of employment without discrimination because of race, religion, color, sex, sexual orientation, gender identity, age, marital status, national origin, citizenship, physical or mental disability, or veteran status with regard to any position of employment for which the applicant or employee is qualified; (3) to provide a workplace free from harassment based on any of the foregoing factors; and (4) encourage the hiring of minorities, women, disabled individuals, and protected veterans.

The purpose also of this policy is to ensure that unlawful discrimination, harassing conduct, regardless of whether it rises to the level of improper conduct prohibited by law, and/or retaliation will not be tolerated and that all Boise Cascade employees will be able to work in an environment free from such improper behavior.

Boise Cascade will make reasonable accommodation for qualified applicants or employees with physical and mental limitations, where an accommodation would enable the individual to perform essential job functions, unless it would impose an undue hardship or present an undue risk to the health and safety of the individual or other employees.

Failure to comply with federal and state regulations as they relate to equal employment could lessen our competitive market position and could lead to unnecessary litigation. It is clearly good business and employee-relations practice and therefore becomes each manager's responsibility to ensure that our policy is understood and followed by all employees throughout the company.

## **II. Affirmative Action**

It is the responsibility of the manager in charge of each facility to ensure that there is a current affirmative action plan in place and that the plan is revised annually. Employees should contact their location's designated EEO Coordinator to view a copy of the current year's Affirmative Action Program for Individuals with Disabilities and Protected Veterans. All managers will be held accountable for achieving affirmative action goals in the same way they are responsible for meeting other corporate and division objectives.

The following actions are required to ensure a continuing implementation of Boise Cascade 's Equal Employment Opportunity Policy:

- A. Continued compliance with all legal requirements for equal employment and affirmative action, including development of an annual affirmative action plan for each location.
- B. Prompt notification to the corporate [Legal Department](#) regarding all compliance reviews and discrimination complaints. Responses to external agencies must be handled in a prompt manner and must be reviewed by the corporate [Legal Department](#) prior to distribution.
- C. Continued improvement in the implementation of affirmative action programs to encompass the:
  1. Establishment of specific goals.
  2. Active recruitment of minorities and women.
  3. Upgrading and training of minorities, women, disabled employees, and employees who are protected veterans.
  4. Designation of an EEO Coordinator for each business unit.

### **III. Discrimination, Harassment and Retaliation**

This policy applies to all Boise Cascade employees, including wholly owned or majority-owned subsidiaries and joint ventures for which the company has management responsibility. It also applies to any subcontractor or supplier and its employees in their dealings with company employees. Appropriate action will be taken against a contractor or supplier found in violation of this policy. Such action includes requiring that a contractor or supplier remove an employee from our premises and not assign that employee to work on our business.

Boise Cascade is committed to providing a professional work environment for its employees that is free from unlawful discrimination; physical, psychological, or verbal harassment; and retaliation against employees who, in good faith, raise complaints of or otherwise oppose such behavior. In keeping with this commitment, unlawful discrimination against any employee in the terms or conditions of employment; harassment of any employee by any supervisor, manager, co-worker, vendor, client, or customer of Boise Cascade; or retaliation against an employee who raises a complaint regarding or otherwise opposes such behavior will not be tolerated. Some discussion of each of these terms is helpful in determining the scope of this policy.

Boise Cascade takes an aggressive stance in prohibiting unlawful discrimination, harassment, and retaliation. This aggressive stance includes the establishment of a complaint process designed to have such concerns raised, investigated and addressed at the earliest possible opportunity. The complaint process will provide for prompt resolution of complaints and appropriate remedial actions when necessary. To that end, because unlawful harassment frequently consists of conduct occurring over a period of time and having a severe or pervasive nature, Boise Cascade's prohibition of harassing conduct goes beyond that prohibited by law.

## A. Discrimination

Unlawful discrimination includes treating, on the basis of gender, race, national origin, marital status, religion, disability, color, age, veteran status, genetic information or any other status protected by applicable federal, state or local law, any employee or applicant for employment differently in regard to the terms and conditions of employment, such as hiring, promotion, compensation or termination.

## B. Harassment

Harassment consists of severe or pervasive conduct that is unwelcome and: (1) interferes unreasonably with an individual's work performance or that creates an intimidating, hostile, or offensive work environment, and (2) is based on another's gender, race, national origin, marital status, religion, disability, color, age, veteran status or any other status protected by applicable federal, state or local law.

Because what constitutes sexual harassment can differ from other types of harassment, sexual harassment deserves special mention. Sexual harassment includes unwelcome sexual advances, such as sexual flirtations; verbal abuse of a sexual nature; graphic verbal comments about a person's body; physical touching; sexual propositions; sexually degrading words used to describe an individual; and the display in the workplace of sexually suggestive objects or pictures. It includes any threat or insinuation, either explicitly or implicitly, that a person's refusal to submit to unwelcome sexual advances will adversely affect that person's employment, evaluation, wages, advancement, duties, shifts, or any other condition of employment or career development.

## C. Retaliation

Retaliation includes taking an adverse employment action against an employee because the employee in good faith raised a concern or participated in an investigation under, or otherwise opposed a policy, practice or action that allegedly conflicted with, state or federal employment discrimination laws. Prohibited retaliation can include a wide range of actions, including but not limited to demotions, failures to promote or transfer, and employment terminations.

## D. Procedure for Reporting Unlawful Discrimination, Harassment, or Retaliation

All Boise Cascade employees are responsible for helping to ensure that we avoid improper conduct in the workplace. Any employee who believes that he or she is the object of unlawful discrimination, harassment, or retaliation or who has knowledge of such improper conduct toward any other employee or a vendor or customer should immediately report it to a supervisor, to the employee's location or business unit's human resources representative, or to the corporate [Legal Department](#). Reports also may be made by utilizing the Create A Responsible Environment (CARE) line 1-800-367-4611. Calls to the CARE line can be placed anonymously, but incomplete information regarding the report may impair the company's ability to investigate it.

A prompt and thorough investigation will be conducted, and appropriate disciplinary action, up to and including termination, will be taken against any employee who is found to have been responsible for a violation of this policy and/or knowingly permitting a violation to exist un-

redressed. Other appropriate corrective action, including transfer or change in assignment, will also be taken in appropriate circumstances. To the fullest extent practicable, the company will keep complaints and the terms of their resolution confidential. Boise Cascade will not retaliate against any employee for lodging a complaint or participating in an investigation.

Supervisors and managers are responsible for informing employees that unlawful discrimination, harassment, and retaliation in any form is prohibited, that any such incidents should be immediately reported, that any reports will be promptly investigated, and that appropriate disciplinary action will be taken if such improper conduct is found to have occurred.

It is the responsibility of any employee who believes that he or she has been subjected to unlawful discrimination, harassment, or retaliation to report it immediately as provided by this policy.

Location managers are responsible for administering this policy for their employees and for ensuring that it is fully implemented at their location in accordance with the company and division guidelines. Inquiries regarding provisions of this policy should be directed to human resources managers or directors.

Once unlawful discrimination, harassment or retaliation is alleged, the allegations must be reported to human resources and the allegations appropriately investigated. In turn, human resources should notify the legal department of the allegations.

#### **IV. Prohibition of Threatening or Offensive Conduct**

##### **A. Prohibited Conduct**

Our policy is that our employees, customers, vendors, and visitors shall be free from violence or threats of violence while on company premises or engaged in the company's business. Violent acts or threats of violence by employees, customers, vendors, or visitors while on our premises or while engaged in company business are prohibited and will not be tolerated by the company.

In an effort to maintain the safety and security of our employees, visitors, and those with whom we do business, Boise Cascade employees, customers, vendors, and visitors are prohibited from carrying weapons in Boise Cascade facilities, regardless of any state permit to carry a weapon. (See [Security & Loss Prevention Policy, 8.5.](#))

This list of behaviors, while not all-inclusive, provides examples of prohibited conduct:

- Causing physical injury to another person.
- Possession of a weapon while in company facilities.
- Fighting, hitting, biting, kicking, pushing, or shoving another person.
- Threatening, intimidating, bullying, or abusing another person.
- Creating a reasonable fear of injury to another person through aggressive or hostile behavior.

- Intentionally damaging company property or property of another on workplace premises.
- Committing acts motivated by or related to domestic violence on Boise Cascade premises.
- Creating a hostile and intimidating work environment.
- Harassing an individual related to company business by stalking or with an excessive number of visits, phone calls, pages, faxes, e-mails, letters, or gifts.
- Lewd behavior or obscene comments, phone calls, pages, faxes, e-mails, letters, gifts, or graffiti.
- Accessing or attempting to access personal or confidential information to further threatening or harassing behavior.

Engaging in the above-listed, prohibited conduct or any other conduct the company deems sufficiently offensive or egregious will subject the employee to disciplinary action as outlined in this policy under Section IV-B, *Enforcement*.

Some conduct, although not prohibited, may indicate impending danger to the safety of an employee and/or the workplace; for example, talk of suicide, being the target of hostile conduct. Employees who have information concerning the safety of an employee or the workplace shall report this information to Human Resources.

#### B. Enforcement

Any Boise Cascade employee determined to have committed acts prohibited under this policy may be subject to disciplinary action up to and including termination. Nonemployees engaged in violent or threatening acts covered under this policy will be reported to the proper authorities. In either case, if applicable, the company will support criminal prosecution.

Boise Cascade reserves the right to remove any person from its premises if that person's behavior is perceived to threaten the safety of its employees or others, and any person removed from the premises shall be kept off the premises pending the outcome of Boise Cascade's investigation.

Boise Cascade may require an employee to participate in the company's Employee Assistance Program (EAP) as a condition of continued employment and may request a "fitness for duty" certification from a healthcare professional before allowing the employee to return to work. Participation in the EAP, whether voluntary or required by the company, shall in no way alter the "at will" employment status of the employee.

#### C. Reporting Concerns

Every employee has an obligation to report conduct in the workplace that is reasonably believed to be suspicious or dangerous, regardless of the alleged offender's identity or position. Reports can be made to any supervisor, manager, or human resource representative. Reports can also be made by contacting the toll-free reporting number for the **CARE line at 1-800-367-4611**.

In addition, Boise Cascade requires that any supervisor or manager identifying a troubling situation consult with a human resource representative for guidance.

