

## **NUCOR CORPORATION POLICY – DISCRIMINATION AND HARASSMENT**

### **A. Introduction**

Nucor is committed to providing a work environment that is free from discrimination and harassment based on an individual's status.

Nucor will not tolerate any form of discrimination or harassment in any aspect of our business. Accordingly, Nucor considers discrimination and harassment to be major offenses that can result in suspension or termination.

Nucor prohibits discrimination and harassment by or directed at any job applicant, teammate, customer, outside vendor, consultant, contractor, or person working with or on behalf of Nucor.

This policy includes behaviors in the workplace and in any work related setting outside the workplace, such as during business trips, business meetings and business related social events.

### **B. Discrimination**

For purposes of this policy, discrimination includes, but is not limited to, firing, refusing to hire, denying training or failing to promote based on an individual's actual or perceived race, color, ancestry, ethnicity, national origin, religion, sex, pregnancy, disability, age, medical condition, veteran status, past, present, or prospective military service, sexual orientation, marital status including domestic partners, gender identity or any legally or statutorily-protected status.

### **C. Harassment**

Nucor prohibits any form of harassment, which includes, but is not limited to:

- Unwelcome remarks or conduct that is based on a teammate's actual or perceived race, color, ancestry, ethnicity, national origin, religion, sex, pregnancy, disability, age, medical condition, veteran status, past, present, or prospective military service, sexual orientation, marital status including domestic partners, gender identity or any legally or statutorily-protected status.

- Non-exclusive examples of unwelcome remarks include inappropriate epithets, slurs, negative stereotyping, offensive jokes or comments, written or graphic material, pictures and graffiti.
- Unwelcome sexual advances, propositions, flirtation, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when (1) submission or rejection of this conduct explicitly or implicitly affects a person's employment; or, (2) submission or rejection of such conduct is used as the basis for employment or promotion decisions affecting the individual; or (3) such conduct unreasonably interferes with a person's work performance, or creates an intimidating, hostile or offensive work environment.
- Physical touching or assault.
- Mental or physical intimidating acts, such as bullying and threatening.
- Any suggestion that a person's job, job benefits, or advancement depends on that teammate giving sexual favors.
- Putting up offensive signs, pictures, cartoons or graffiti in the workplace.
- Inappropriate use of social networking or internet sites, company computers, company telephones or other company electronic devices to access, send or maintain messages or images of a harassing nature.

#### **D. Complaint Procedure**

Nucor is committed to preventing discrimination and harassment in all aspects of our business. However, Nucor is unable to respond to a teammate's concern about discrimination or harassment if it is unaware such conduct has occurred or is occurring. Therefore, if you believe that you or another teammate are being discriminated against or harassed in any way by another teammate, by a supervisor or manager, by a customer, or by anyone with whom you come into contact during your work, it is your obligation to report these actions immediately.

You should report discrimination or harassment to your Supervisor, Human Resources, the next higher level of management above your immediate supervisor, or the General Manager. You may also report discrimination or harassment by calling 1-800-307-0233. If the person engaging in the harassing behavior is one of the persons listed above as a report person, simply telling the person to stop the harassing behavior will not serve as a sufficient report of your concern. In such a case, it is your obligation to escalate your concerns to the next higher level of management for reporting purposes.

If a Nucor manager or supervisor observes, receives a report or otherwise becomes aware of a possible violation of this policy, he/she must immediately report such conduct to Human Resources for investigation. Any manager or supervisor who fails to report a

possible violation of this policy may be subject to disciplinary action, up to and including termination. The General Manager will also be notified of any possible violation of this policy.

Nucor will take any reported violation of this policy seriously, and will promptly, thoroughly, and impartially investigate any reported violation in accordance with the procedures set forth below. An investigation will be conducted regardless of whether the report initially includes physical evidence of the alleged conduct or corroborating witnesses. The purpose of an investigation is to neutrally gather facts relevant to the alleged violation of the policy.

Each discrimination or harassment investigation will be documented in writing and will involve the following steps:

- A member of Human Resources and/or Nucor's Legal team (the "Investigative team") will be involved in the investigation.
- The Investigative Team and potentially others in management will listen and gather facts by conducting an interview of the person reporting discrimination or harassment. The reporting individual will be asked if there are any witnesses or documents that would support the report and any such documents will be collected by the Investigative Team.
- A written report will be prepared detailing the interview of the person reporting discrimination or harassment.
- Any person alleged to have violated this policy will be interviewed by the Investigative Team and potentially others in management who will listen and gather facts by conducting an interview. This person will be asked if there are any witnesses or documents that would support their position and any such documents will be collected by the Investigative Team.
- Any witnesses to the reported discrimination or harassment will be interviewed.
- Nucor will make a determination as to what occurred based on the information gathered during the investigation.
- After the investigation has concluded, Nucor will make a determination on the appropriate corrective action, if any, based on the circumstances of each individual investigation.
- The outcome of the investigation and any corrective action will be documented.
- The Investigative Team or a member of management will follow-up with the person who reported discrimination or harassment, both to update the person and to ensure that no further action is required. While feedback will be provided

as soon as possible, the time required to conclude an investigation may vary from case to case.

- If Nucor determines during the investigation that this policy has been violated, it will determine the appropriate corrective action to stop the misconduct and to prevent future violations of this policy. Corrective action may include, for example, training, referral to counseling or disciplinary action such as a warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination, as Nucor believes appropriate based on the results of the investigation.
- Similarly, any teammate who fails to report any form of discrimination or harassment may be terminated for failing to report.
- Nucor will make every reasonable effort to maintain the confidentiality of all parties involved in any investigation. Nucor will disclose information to only those having a need to know in order to facilitate the investigation or resolution.
- If you have reported discrimination or harassment and are dissatisfied in any way with the investigation, immediately report your dissatisfaction to the next higher level of management.

**E. No Retaliation**

Nucor strictly prohibits, and considers it a violation of this policy, if anyone retaliates in anyway against any teammate for using the complaint procedures or participating in any way in an investigation.

Teammate Signature \_\_\_\_\_

Date \_\_\_\_\_

Manager Signature \_\_\_\_\_

Date \_\_\_\_\_