



Control No: HR 102

Policy Name: Fair Treatment of Others Policy

Responsible Corporate Function/Business Segment: Human Resources

Effective: 1 October 2017

Coverage: Global--All employees, which term includes for purposes of this policy temporary employees and contract and subcontract workers

Policy Overview & Objective

Employee relations at Greif are based on the principle that all individuals, regardless of their job title and/or individual characteristics and backgrounds, will be treated with respect and fairness. Everyone at Greif shares the responsibility for adhering to and practicing this principle. Greif expects that every employee will assist in maintaining an environment that is free from inappropriate behaviors.

This policy identifies the expectations of all employees, as well as how any employee can and should report workplace behavior that he or she feels is not in keeping with the policy of **Fair Treatment of Others Policy (HR 102 – Global)**.

This policy identifies the behaviors that are prohibited, including any act that violates the country (federal or local) laws of our locations.

The Policy

This list is not necessarily all-inclusive, but provides the most serious offenses against another person that will not be tolerated within Greif. Greif reserves the right to exercise discretion for behaviors that are not listed below:

- Abusive language
- Assault
- Circulation or display of offensive materials
- Damage to company or employee property
- Discrimination based on:
 - Gender, sexual orientation, race, color, religion, ancestry, national origin, disability status, age, veteran/military status, marital status, gender identity, genetic information or any other characteristic protected by applicable law.
- Insubordination
- Reckless operation of company equipment
- Retaliation
- Threatening, or provoking violence against a person with words, physical actions, or weapons
- Violation of your plant/office work rules

Policy Administration

Each employee is responsible for following this policy.

Each supervisor/manager is responsible for:

- Communicating this policy to his/her work group;
- Promptly engaging Human Resources and/or other appropriate person and jointly evaluating and investigating allegations of behavior not consistent with this policy;
- Ensuring that inappropriate behavior does not occur in his/her location; and
- Ensuring that this policy is administered consistently and fairly.

The Human Resources Representative is responsible for:

- Ensuring that all employees and business partners are aware of this policy;
- Leading or working with appropriate internal investigator to conduct a prompt and thorough investigation of policy violations, working with the location's management; and
- Ensuring that this policy is administered consistently and fairly.

Reporting Inappropriate Behavior

Any employee can and should report workplace behavior that he or she believes does not comply with the policy. Reporting should be to the employee's supervisor/manager, HR Representative or to the **Greif Alert Line**. Upon receipt of a complaint, the supervisor/manager will immediately contact the Human Resources Representative for your location. The Human Resources Representative or other appropriate person will lead a prompt and thorough investigation. If the complaint is about the HR Representative, the investigation will be conducted by another Human Resources employee or other appropriate person. If the report is made through the **Greif Alert Line**, the matter will be investigated by the appropriate Human Resources Representative or other appropriate person. Please see additional information for the **Greif Alert Line** under the Reference section below.

Greif takes allegations of inappropriate behavior very seriously.

Accordingly:

- Once a report of a possible violation of the policy has been made to the attention of management or Human Resources, the report must be investigated.
- There will be no retaliation against any employee who in good faith reports a possible violation of the policy.
- Employees who make knowingly false or misleading claims or allegations in their report or during the investigation will be subject to disciplinary action.

Investigation Process

- The Human Resources Representative or appropriate person will use interviews to determine the facts of the situation. These interviews will include the reporting employee, the employee(s) alleged to have violated the policy and witnesses (if any). The interviews will be documented.
- Any information reported during the interviews will only be disclosed by the Human Resources Representative or appropriate person on a need-to-know basis in order to investigate and resolve the matter, or as required by law.
- Based on the investigation findings, the Human Resources Representative or appropriate person and senior management of your location will reach a conclusion, and you will be notified of the findings.

Disciplinary Action

Violations of the policy may result in disciplinary action.

Questions

Questions regarding these procedures should be directed to your Human Resources Representative.

References

The **Greif Alert Line** is a free telephone service available to employees around the world 24 hours a day, 7 days a week. This toll-free telephone line will be answered by an outside service company, which will take your report and work with Greif personnel to address and resolve the issue. You do not have to give your name to the Greif Alert Line specialist unless you decide to do so.

The **Greif Alert Line** number is +1 (877) 781-9797. If you call from outside of North America, you can call this number free of charge by using the AT&T Direct access code for your country. Country access codes are found at <http://www.business.att.com/bt/access.jsp>.

Addendum

Effective: 08/01/2006, Revised 11/01/2007