

<b>Tredegar Corporation Policies</b> <b>Human Resources Policies</b>		<b>Number:</b> HR.03.00.1201
		<b>Revision No.:</b> 1
<b>Title:</b> <b><i>Zero Tolerance for Sexual Harassment Policy</i></b>		<b>Owner:</b> Executive Director, Corporate Human Resources
<b>Effective Date:</b> September 17, 2012	<b>Supersedes Date:</b> January 31, 2008	<b>Approved By:</b> Executive Director, Corporate Human Resources

Applies to: Tredegar Corporation (“Tredegar” or the “Company”), which includes all legal entities for which the management of the Company has responsibility.

Abstract: The purpose of this policy is to ensure that human resources practices throughout the Company adhere to legal requirements associated with sexual harassment and that employment practices are conducted in a manner that values and respects all individuals.

This policy governs the related section of the **Code of Conduct**. Exceptions to the policy must be by written authorization.

All employees are responsible for assuring that the workplace is free from sexual harassment and are prohibited from engaging in related activity which creates a hostile work environment for other employees. Tredegar’s “zero tolerance” of offensive or inappropriate behavior includes any location, activity or event or other social or business settings in which employees may find themselves in connection with their employment.

Sexual harassment is defined as any behavior of co-workers, managers, supervisors, vendors, suppliers, contractors, customers or visitors, based on sex, which is unwelcome, personally offensive, intimidating, insulting or demeaning and includes the following:

- Unwelcome sexual advances or invitations to engage in sexual activity;
- Unwelcome invitations or pressure to engage in sexual activity as a condition of employment, promotion or wage increase;
- Unwelcome sexual innuendo, sexually suggestive comments or remarks, sexual comments about a person’s attire, body or reputation, offensive sexual/sexist jokes or humor, sexual propositions, verbal abuse of a sexual nature, and sexual threats;
- Unwelcome sexually suggestive, lewd, or graphic objects or pictures, graphic written material, suggestive or insulting sounds, leering, whistling, or obscene gestures;
- Unwelcome physical contact, including touching, pinching, brushing by the body, rubs, massages, coerced sexual activity or sexual assault;
- Use of computers and other company devices to access the internet for the purpose of viewing, displaying, downloading, or sending material that displays pornographic or sexually explicit pictures, drawings, cartoons or caricatures of a sexual nature; and
- Use of company email or other media to send text messages, jokes, or pictures of a sexual nature.

Sexual harassment by any employee, manager, supervisor, vendor, supplier, contractor, customer or non-employee will not be tolerated. All employees and non-employees alike will be

expected to strictly comply with this policy and to take appropriate measures to ensure that such conduct does not occur. Any employee who violates this policy will be subject to appropriate disciplinary action up to and including termination of employment.

Retaliation against any individual who makes a complaint of sexual harassment or cooperates in the investigation of such a complaint is strictly prohibited. Tredegar will not tolerate any employee being intimidated, coerced, threatened, discriminated or retaliated against for filing a complaint, providing information verbally or in writing, or for participating in a complaint investigation.

A false allegation of sexual harassment intended to harm another employee is a violation of this policy and is subject to disciplinary action up to and including discharge. To constitute such a violation, the complaint must be clearly shown to have been intentionally made in bad faith and to be false as to specific allegations of fact.

The procedure for reporting incidents of sexually harassing behavior shall not impair, replace or limit the right of any employee to seek a remedy under available federal, state or local laws by reporting the matter to the appropriate federal or state commission or local human rights agency.

#### **Responsibilities of Corporate and Division Human Resources**

All Tredegar global locations will post a local procedure for filing complaints of sexual harassment. The complaint process shall permit the employee to file a complaint with the employee's manager/supervisor, the site director/manager, the location's Human Resources representative, division Human Resources director/manager, or Tredegar's Executive Director of Corporate Human Resources in the United States. Complaints will be immediately investigated and promptly resolved.

Tredegar's IntegrityLine is a toll-free telephone line for use by Tredegar employees who have compliance or integrity concerns or questions. The toll-free number is (888) 475-8271.

The IntegrityLine is also a way for employees to report suspected compliance or integrity issues anonymously, if they wish to do so. Employees who do not want to reveal their name will be assigned control numbers. These numbers allow employee to call back at a later date to receive a response or provide additional information.

Every Tredegar subsidiary and division is responsible for the implementation of the Company's global zero tolerance for sexual harassment policy. This includes initiating and supporting programs and practices designed to develop understanding, acceptance, commitment, and a culture that values compliance with the policy. All global employees must be informed that sexual harassment will not be tolerated, and each manager and supervisor will be responsible for orienting his/her employees to Tredegar's policy. Each global human resources representative will be expected to keep his/her facility aware of changes on the local law or its interpretation regarding sexual harassment.

Employees will be informed that if the complaint involves someone in the employee's direct line of supervision or the employee has personal reasons for not using the complaint procedure, the employee may bypass the usual complaint procedure and may go directly to any company official.

Each facility will be responsible for:

- Posting Tredegar's global zero tolerance policy against sexual harassment;
- Clearly and regularly communicating the policy;
- Effectively implementing the policy;
- Raising the subject with supervisory and non-supervisory employees;
- Expressing strong disapproval of sexual harassment discrimination;
- Warning of disciplinary action for any harassment;
- Establishing specific procedures for resolving complaints during and after normal hours;
- Encouraging employees to immediately report complaint;
- Not requiring employees to complain to an offending supervisor;
- Establishing a procedure that bypasses the usual complain procedures and goes directly to the corporate headquarters;
- Ensuring confidentiality to the extent possible to conduct an effective investigation;
- Providing immediate effective remedies; and
- Providing for protection of the employee and witnesses against retaliation and for follow up to ensure that no retaliation has occurred.

The Company recognizes that the question of whether a particular action, situation or comment in the workplace is welcome or unwelcome or a personal, social interaction or relationship without a discriminatory effect or creates an intimidating, hostile, or offensive work environment or substantially interferes with work performance requires a factual determination based on the totality of the circumstances. In determining whether an alleged behavior constitutes unlawful sexual harassment, the full context in which the incident occurred shall be considered.