



**Swank Associated Companies, Inc.**

200 Hunt Valley Road  
New Kensington, PA 15068  
(724) 335-6000 Fax (724) 335-3834

**Ronald J. Hags**

EEO Officer

An Equal Employment Opportunity Company

To: All Employees  
From: Ron Hags  
Date: Monday, November 21, 2005  
RE: Company Policies

Each employee of Swank Associated Companies, Inc. is entitled to a work environment free of sexual harassment and discrimination of any kind. Following are the policies of Swank Associated Companies, Inc. with respect to those issues.

**Sexual Harassment Policy**

Harassment on the basis of sex is a violation of Section 803 of Title VII of the Civil Rights Act of 1964 and the Guidelines on Sexual Harassment adopted by the Equal Employment Opportunity Commission and the Pennsylvania Human Relations Commission.

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual.
3. Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

We will not tolerate such actions in the day – to – day activities of this company. Those guilty of such behavior and those supervisory personnel who knowingly allow it to exist will be subject to disciplinary action.

Complaints of alleged sexual harassment and reports of such incidents should be documented and addressed to: Ronald J. Hags, EEO Officer, (724) 335-6000, 200 Hunt Valley Road, New Kensington, PA 15068

**EQUAL EMPLOYMENT POLICY**

It is the policy of Swank Associated Companies, Inc., to offer equal opportunity for employment to all qualified persons without regard to a person's race, color, creed, sex, age, veteran status, or national origin. It is the intention of the Company, through the adoption and implementation of this policy, to insure full and complete compliance with the Civil Rights Act of 1964, Executive Order No. 11246, and any other Federal or State Equal Employment Opportunity Order or applicable regulations. It shall be the obligation of all those who share on the management of the Company to implement the terms of this policy to insure that the Company is at all times in full and complete compliance with both the letter and spirit of all Equal Opportunity concepts.

Ronald J. Hags  
EEO Officer

