

	Date Released: 11-NOV-2019		Rev: A
	Doc Title: Abusive Conduct Prevention		
	Function/Owner: Legal/Corporate Compliance	Policy Number: 10.4	
	Formerly: "Abusive Conduct Prevention," 11/27/2019, Policy No. N/A		Page 1 of 3

1.0 PURPOSE:

The purpose of this policy is to define the circumstances and behavior Albany International Corp. ("Albany" or the "Company") considers detrimental and harmful to persons and the workplace, to which such conduct qualifies as abusive in nature.

2.0 SCOPE:

This policy applies to all Company employees, managers, officers, consultants and contractors, including those of Company subsidiaries where-located.

3.0 DEFINITIONS:

Term / Acronym	Definition
N/A	N/A

4.0 POLICY:

Albany is firmly committed to a workplace free from abusive conduct. All Company employees have the right to be treated with dignity and respect. All complaints of negative and inappropriate workplace behaviors will be taken seriously and followed through to resolution. Employees who file complaints in good faith will not suffer negative consequences for reporting others for inappropriate behavior.

4.1 The Definition of Abusive Conduct

Abusive conduct includes acts or omissions that would cause a reasonable person, based on the severity, nature, and frequency of the conduct, to believe that an employee was subject to an abusive work environment. Abusive conduct can include, but is not limited to:

- Repeated verbal abuse in the workplace, including derogatory remarks, insults, and epithets;
- Verbal, nonverbal, or physical conduct of a threatening, intimidating, or humiliating nature in the workplace; or
- The sabotage or undermining of an employee's work performance in the workplace.

A single act generally will not constitute abusive conduct, unless such conduct is determined to be severe and egregious. Abusive conduct does not include:

- Disciplinary procedures in accordance with other Company policies (including but not limited to the Company's Business Ethics Policy);
- Routine coaching and counseling, including feedback about and correction of work performance;
- Reasonable work assignments, including shift, post, and overtime assignments;
- Individual differences in styles of personal expression;
- Passionate, loud expression with no intent to harm others;
- Differences of opinion on work-related concerns; or
- The non-abusive exercise of managerial prerogative.

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4.2 Employer Responsibility

Supervisors and others in positions of authority have a particular responsibility to help ensure that healthy and appropriate behaviors are exhibited at all times and that complaints of abusive conduct are addressed in a timely manner. Supervisors, with the support and guidance of the HR and Legal/Compliance departments, are expected to:

- Participate actively in all Company-mandated training events relative to this policy, and provide support and assistance to HR and Legal/Compliance department employee training initiatives and events;
- set a good example by treating all co-workers with courtesy and respect;
- ensure that all employees have access to and are aware of the abusive conduct prevention policy and explain the procedures to be followed if a complaint of abusive conduct at work is made;
- be vigilant for signs of abusive conduct at work through observation and information seeking, and take appropriate action to advise, counsel and intervene if appropriate; and
- respond promptly, sensitively and confidentially to all situations where abusive conduct is observed or alleged to have occurred.

4.3 Employee Responsibility (Including Witnesses)

Employees shall treat all other employees with dignity and respect. No employee shall engage in threatening, violent, intimidating or other abusive conduct or behaviors. Employees are expected to assume personal responsibility to promote fairness and equity in the workplace and report any incidents of abusive conduct in accordance with this policy.

Employees should co-operate with preventative measures introduced by supervisors and recognize that a finding of unacceptable behaviors at work will be dealt with through appropriate disciplinary procedures.

4.4 Retaliation

Retaliation is a violation of this policy. Retaliation is any act of reprisal, interference, restraint, penalty, discrimination, intimidation, or harassment against an individual or individuals exercising rights under this policy.

4.5 Training for Supervisors and Employees

All supervisors and employees are encouraged to undergo training on abusive conduct prevention conduct as directed by the Company from time to time. Training may address, among other things, the factors that contribute to a respectful workplace, familiarize participants with responsibilities under this policy, and provide steps to address an abusive conduct incident.

4.6 Complaint Process

4.6.1 Reporting

i. Employees

Any employee who feels he or she has been subjected to abusive conduct is encouraged to report the matter orally or in writing to a supervisor including his or her supervisor or manager, or to their

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local human resources department. Employees should not feel obligated to report their complaints to their immediate supervisor first before bringing the matter to the attention of one of the representatives identified above. Employees not comfortable using one of the above means of reporting may also file a report on the Company's whistleblower platform (www.albint.ethicspoint.com).

Any employee seeking to file a complaint should ensure the complaint consists of precise details of each incident of abusive conduct including dates, times, locations and any witnesses.

ii. **Witnesses**

An employee who witnesses or is made aware of behavior that may satisfy the definition of abusive conduct (as defined herein) should report any and all incidents as set forth herein.

iii. **Supervisors**

Supervisors must report in a timely manner known incidents involving workplace abuse, intimidation, or violence to the local human resources department. Supervisors should take reasonable steps to protect the complainant, including, but not limited to, separation of employees involved.

4.7 Investigation

Investigations of abusive conduct shall be conducted as soon as practicable and in accordance with the Company's policies and practices. Investigations may be conducted by the Company's Legal/Compliance Department, by designated HR managers acting at the direction of the Legal/Compliance Department, or by a third party. The objective of the investigation is to ascertain whether the behaviors complained of occurred, and therefore will include interviewing the complainant, accused, and witnesses with direct knowledge of the alleged behaviors. All interviews will be appropriately documented. The investigation will be conducted thoroughly, objectively, with sensitivity, and with due respect for all parties. All affected parties will be informed of the investigation's outcome.

4.8 Corrective Action

Any employee who is found to have engaged in conduct that violates this policy will be subject to corrective action. Such corrective action may include, but is not limited to, participation in counseling, training, and/or disciplinary action up to and including changes in job duties, location, or even termination.

5.0 FREQUENCY OF REVIEW AND UPDATE:

The Legal Department and the Assistant General Counsel will review the policy annually to determine if updates are needed, as well as to assess organizational compliance with the policy.

6.0 ADDITIONAL POLICIES TO CONSIDER:

- Business Ethics Policy
- Complaints and Concerns
- Workplace Investigations
- Records Retention

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