



INTERNATIONAL ANTI-HARASSMENT POLICY

In addition to any requirements specified by law, regulation, or practice, it is our longstanding policy to provide equal employment opportunity to all employees and applicants for employment. All persons, regardless of race, religion, color, sex, sexual orientation, age, pregnancy, national origin or ancestry, physical or mental disability, or any other legally protected status, will have an equal opportunity in all employment decisions including recruitment, selection, evaluation, promotion, compensation, training, job assignments, layoff and termination by the Company.

It is our policy to provide all employees a workplace free from harassment. The Company expects all employees, regardless of title or position, to abide by and carry out these principles, and to convey this spirit in everyday relationships with other employees, customers, suppliers, visitors and the public.

This anti-harassment policy prohibits employees from harassing any other employee, customer, vendor or Company visitor on any of the bases (race, religion, sex, sexual orientation, etc.) listed above. Harassment consists of unwelcome conduct, whether verbal, physical or visual, that is based upon a person's protected status. (Protected status means race, religion, sex, sexual orientation, etc. as described above.) The Company will not tolerate harassing conduct that affects tangible job benefits, interferes unreasonably with an individual's work performance, or creates an intimidating, hostile, or abusive working environment.

Sexual harassment deserves special mention. Unwelcome sexual advances, requests for sexual favors, and other physical, verbal or visual conduct based on sex constitutes sexual harassment when (1) submission to the conduct is an explicit or implicit term or condition of employment, (2) submission to or rejection of the conduct is used as the basis for an employment decision, or (3) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. Sexual harassment may include explicit sexual propositions, sexual innuendo, suggestive comments, sexually oriented kidding or teasing, practical jokes, jokes about gender-specific traits, foul or obscene language or gestures, display of foul or obscene printed or visual material, and physical contact such as patting, pinching, or brushing against another's body.

All employees are responsible to help assure that everyone avoids any type of harassment.

To that end, if you feel you are being harassed, you should feel free to tell the harasser politely and firmly that you find his (or her) behavior offensive, and you want it to stop. You may do this either verbally or in a note if that is more comfortable. The Company will support you in your effort to solve the problem yourself, but you are not required to do so (and should not attempt to do so if physical intimidation or other severe behavior is involved). If you feel that you have experienced or witnessed harassment (whether or not you attempt to handle it yourself), you are to immediately notify either your supervisor (unless he or she is the problem), the next level of management above your immediate supervisor, any other manager or officer whom you feel you can comfortably approach, your Human Resources Representative, Corporate Human Resources, or ESCO's Corporate Ethics Officer (314) 213-7200 or the Corporate Ombudsman (800) 272-0872. If you

prefer to contact the above via email or if other than English, you can contact ESCO at the following email addresses:

Corporate Human Resources: dhanlon@escotechnologies.com
Corporate Ethics Official: corporateethicsofficial@escotechnologies.com
Corporate Ombudsman: ombudsman@escotechnologies.com

All complaints or incidents received by any supervisor, manager or officer must be reported to their Human Resources Representative immediately. It would be helpful if you or the complaining party can furnish specific details of the harassing behavior including the date, time, place and names of any witnesses. The Company forbids retaliation against anyone for reporting harassment, assisting in making a complaint, or cooperating in an investigation.

The Company's policy is to investigate all such complaints thoroughly and promptly. To the fullest extent practicable, the Company will keep complaints and the terms of their resolution confidential. If an investigation confirms that harassment has occurred, the Company will take prompt corrective action, including such discipline, up to and including immediate termination of employment, as it deems appropriate.