



STILLWATER MINING COMPANY

Harassment and Discrimination Policy

As amended and restated on February 19, 2016

POLICY AND OBJECTIVE

Stillwater Mining Company is committed to the principles of equal employment opportunity in all terms, conditions or privileges of employment, and has developed this Policy to ensure that all its employees can work in an environment free from harassment, discrimination, bullying and retaliation. Stillwater Mining Company will make every reasonable effort to ensure that all employees are familiar with these policies, and are aware that any complaint of a violation will be investigated and due process given.

We do not discriminate against applicants or employees on the basis of age, race, sex, color, religion, national origin, disability, sexual orientation and gender identity or expression, or any other status protected by federal, state or local law. This prohibition includes harassment based on any of these protected classes. Harassment includes verbal, non-verbal or physical conduct that has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, unsafe or offensive work environment. Bullying is unwelcomed or unreasonable behavior that demeans, intimidates or humiliates people, either as individuals or as a group. It can be persistent, or it can occur as a single incident.

This policy applies to ALL employees.

Conduct prohibited by this Policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

EFFECTIVE DATE

This policy came into effect February 1, 2002 and, as revised on February 19, 2016, remains effective, in its entirety, until otherwise revised or removed. This policy also replaces any and all previous published policies relating to this subject.

SEXUAL HARASSMENT

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. The Company will not tolerate sexual harassment and inappropriate sexual conduct. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal, non-verbal or physical conduct of a sexual nature, when:

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

All employees are expected to conduct themselves in a professional and businesslike manner at all times. Inappropriate sexual conduct that could lead to a claim of sexual harassment is expressly prohibited by this policy. Title VII of the Civil Rights Act of 1964 recognizes two types of sexual harassment – quid pro quo (conditioning of employment or employment benefits on an applicant's or employee's submission to unwelcomed sexual conduct) and hostile work environment. Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Such conduct includes, but is not limited to, sexually implicit or explicit communications whether in:

- Verbal form -- such as comments, "jokes," foul or obscene language or language of a sexual nature, gossiping or questions about another's sex life, or repeated unwanted requests for dates;
- Non-Verbal form – sexually suggestive objects or pictures, calendars, items on screen savers, suggestive or insulting sounds, leering, whistling and obscene gestures;
- Message or written form -- such as social media, cartoons, posters, notes, letters or e-mail;
- Physical gestures and other non-verbal behavior -- such as unwelcome physical contact, including touching, grabbing, fondling, kissing, massaging, and brushing up against another's body, coerced sexual acts or assault.

HARASSMENT

Harassment on the basis of other protected characteristics is also strictly prohibited. Under this Policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, sex, sexual orientation, genetic identity or expression, national origin, age, disability, marital status, citizenship, genetic information or any other characteristic protected by law, or that of his or her relatives, friends or associates, and that: a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; b) has the

purpose or effect of unreasonably interfering with an individual's work performance; or c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping, threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment by e-mail, phone (including voice mail messages), text messages, social networking sites or other means.

FILING A HARASSMENT OR DISCRIMINATION COMPLAINT

Stillwater Mining Company encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. If an employee believes there has been a violation of the Harassment and Discrimination Policy as outlined above including sexual harassment, he or she is expected to make a timely complaint. This will enable the Company to promptly investigate and correct any behavior that may be in violation of this Policy.

The employee should report the incident to his or her supervisor or the Human Resources Manager, who will promptly investigate the matter and take appropriate corrective action. The complaint will be kept as confidential as is practicable. If the supervisor or the Human Resources Manager is unavailable, or the employee feels he or she cannot go to either of these individuals with a complaint, the employee should report the incident to the Vice President of Human Resources, the legal department, or an employee may make an anonymous report through the Company's Whistleblower Hotline at 1-800-461-9330 or via email to www.mysafeworkplace.com.

If the Company determines that an employee's behavior has violated this policy, appropriate disciplinary action will be taken against the offending employee, up to and including termination of employment.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this Policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately, and will be promptly investigated and addressed.

False and malicious complaints of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of appropriate disciplinary action.