

---

**CORPORATE PROCEDURE 305.2**

---

**EQUAL EMPLOYMENT OPPORTUNITY PROCESS**

---

See also: Policy 305, Equal Employment Opportunity  
Procedure 210.1, Handling Legal Process  
Procedure 305.1, Collection and Maintenance of  
Employee Medical Records

**GENERAL**

This Procedure establishes the method for handling notices, documents, inquiries regarding Equal Employment Opportunity, including complaints concerning employment discrimination of any sort, affirmative action, or similar matters, and sets forth Norfolk Southern Corporation's ("Corporation") internal complaint procedure for employees who believe they are the subject of employment discrimination or harassment. Employees have a responsibility to report complaints or concerns regarding employment discrimination or harassment. Employees are responsible for their conduct whether on or off the property, including with vendors, independent contractors, customers and other non-employees, where such conduct relates to their employment with the Corporation.

This Procedure contains the following sections:

SECTION I - COMPLAINTS RECEIVED FROM PERSONS WITHIN OR  
OUTSIDE THE CORPORATION REGARDING EMPLOYMENT  
DISCRIMINATION OR HARASSMENT

SECTION II - COMPLAINTS RECEIVED FROM ANY GOVERNMENTAL  
AGENCY OR CIVIL RIGHTS ORGANIZATION

NOTE: This Procedure does not govern the handling of lawsuits, subpoenas, discovery documents or other legal process issued by a court, even those pertaining to equal employment opportunity matters, which should be handled in accordance with Procedure 210.1, Handling Legal Process.

**SECTION I- COMPLAINTS RECEIVED FROM PERSONS WITHIN OR OUTSIDE  
THE CORPORATION REGARDING EMPLOYMENT  
DISCRIMINATION OR HARASSMENT**

**INTERNAL COMPLAINTS INVOLVING OTHER EMPLOYEES**

**RESPONSIBILITY**

**ACTION STEPS**

EMPLOYEE

1. A. If an employee has a complaint or question about an EEO matter, the employee should first discuss it with their immediate supervisor, if practical.
- B. If discussion with their immediate supervisor is not practical because the supervisor is part of the complaint, or if the supervisor is the subject of the complaint, or if a problem remains after the discussion, the employee must report the complaint or question to the Corporation's EEO staff.

SUPERVISOR

2. A. Take prompt action to investigate every complaint or question.
- B. Promptly investigate all allegations of unlawful discrimination.
- C. The supervisor should seek assistance from the Corporation's EEO staff when uncertain about how to conduct an investigation or handle a certain type of complaint. In all cases of complaints, the supervisor must inform the EEO staff of the complaint and the outcome of the investigation. (Many charges of discrimination can be investigated and resolved at the local level.)

- D. Advise individuals alleging discrimination that their complaints will be kept confidential, except as necessary to resolve the situation.
- E. Make sure the employee understands that the complaint(s) will be taken seriously, acted upon immediately and, under no circumstances will the employee suffer any retaliatory action.
- F. Resolve the complaint and conduct follow-up interviews with the involved employee(s), informing them of the Corporation's decision.

**INTERNAL COMPLAINTS RECEIVED FROM OR FILED AGAINST THIRD PARTIES  
(Non-Employees)**

- |             |   |
|-------------|---|
| EMPLOYEE    | 1. If an employee perceives a discriminatory situation concerning a third party has occurred, the employee should contact their supervisor. |
| SUPERVISOR  | 2. Contact the Corporation's EEO staff for advice before proceeding with investigation of the complaint.                                    |
| EEO OFFICER | 3. Assist with investigation of the complaint.  |

**SECTION II - COMPLAINTS RECEIVED FROM ANY GOVERNMENTAL AGENCY  
OR CIVIL RIGHTS ORGANIZATION**

**RESPONSIBILITY**

**ACTION STEPS**

- |                    |   |
|--------------------|---|
| RECEIVING EMPLOYEE | 1. A. Upon receipt, immediately contact the Corporation's EEO staff by telephone. |
|--------------------|---|

- B. Date stamp the document received, noting the office name on the document if the stamp does not indicate the office where received.
- C. Promptly forward document(s) to the Assistant Vice President Diversity and EEO.

SUPERVISOR

- 2. A. Complaints of employment discrimination and/or harassment and details regarding audits, reviews and investigations by governmental agencies must be handled with the strictest confidentiality.
- B. Provide information only to those who need to know.
- C. Do not retain copies of correspondence regarding individual complaints of discrimination.
- D. Do not make reference to a discrimination complaint part of an employee's personnel file (including, but not limited to, a letter of determination received from a government agency).

EEO OFFICER

- 3. A. Contact the employing department(s) and/or office(s) to obtain documentation and information necessary to respond to a complaint, audit, review or investigation.

- B. Be present (in person or by telephone conference call) during any discussions with a third party.

EMPLOYEE

- 4. Do not discuss charges of discrimination, audit reviews or investigations with anyone without approval from the Corporation's EEO staff.

Any questions concerning the above should be addressed to the Assistant Vice President Diversity and EEO, Three Commercial Place, Norfolk, Virginia 23510-9213. The Corporation's EEO staff is available to discuss employees' concerns by telephone, microwave or area code (757) 629-2622; or by e-mail at [eeonorf@nscorp.com](mailto:eeonorf@nscorp.com) and will fully investigate all complaints. The EEO staff can also be reached by calling toll free 1-888-TALK EEO (825-5336). All communications concerning EEO matters will be kept in strictest confidence, except as necessary for resolution.

AUTHORIZED:

---

Corporate Secretary