



## Harassment-Free Workplace

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Alberici strives to be a model workplace, at all its facilities, where employees are cultivated to their highest potential and treated equitably with respect. We achieve this most effectively when all employees are encouraged in their performance through inclusion and development. One way we can do this is to build and maintain a workplace in which we uphold policies and practices to prevent, report, investigate and appropriately resolve allegations of harassing conduct. To create a workplace culture that acknowledges the harm of harassing conduct and promotes accountability when acting to resolve harassment or other forms of discrimination or retaliation, we must engage with intention and promote mechanisms to report misconduct. Furthermore, Alberici does not condone retaliation against any employee making a good-faith report of harassing conduct, including witnesses or bystanders, and will provide training and education to managers, supervisors, and employees on how to recognize and report conduct that may be in violation of Alberici's policy.

Alberici prohibits harassing conduct, defined as any unwelcome verbal, written, or physical conduct including, but not limited to, conduct based on race (including hairstyles historically associated with race, dress and grooming), color, ancestry, national origin (including ethnicity, accent, and use of a language other than English), citizenship, religion or religious creed (including reasonable accommodation of religious beliefs or practices), physical or mental disability (including reasonable accommodation of physical or mental disability), genetic information, sex (including pregnancy, childbirth, lactation, abortion, and related medical conditions and procedures), sexual orientation, gender identity, gender expression, intersex conditions, age, parental status, marital status, military or veteran status, political affiliation or any other legally protected status under federal, state or local law, and/or harassing conduct done in retaliation for engaging in protected Equal Employment Opportunity (EEO) activity (e.g., filing or participating in a complaint or otherwise opposing discrimination, including harassment). Harassment includes behavior that can reasonably be considered to adversely affect the work environment (that is, potentially giving rise to a "hostile work environment"). Harassment also includes "quid pro quo harassment," conduct that generally results in a tangible employment decision based upon acceptance or rejection of advances or requests for sexual or other favors.

Alberici also prohibits retaliation against any employee for making a good-faith report of harassing conduct, cooperating with or participating in any investigation of alleged harassing conduct, or otherwise engaging in protected activity. Aggrieved individuals or alleged victims—and any witnesses participating in this process—should feel assured that Alberici will act with sensitivity and uphold confidentiality to the greatest extent possible in investigating complaints.

Alberici is committed to taking prompt and effective action against harassing conduct if it is appropriately notified of this behavior. Alberici prohibits harassing conduct at every level in the company, including when the conduct is committed by administrators, supervisors, managers, co-workers, contractors, clients, or customers, and could offend an employee even if he/she is not the intended target. Alberici prohibits harassing conduct in a variety of contexts, including off-site or off-duty, during official travel or at a work event, or even using social media.

Employees or contract employees engaged in Alberici workspaces who believe that they have been directly or indirectly subjected to or have witnessed any harassing conduct should promptly report the matter to a person in their supervisory chain, the Chief



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Compliance Officer and/or the Equal Employment Opportunity Commission at 1 (800) 669-4000. Any applicants for employment with Alberici who believe that they have been subjected to harassing conduct during the application process should report the incident to the Chief Compliance Officer and/or the Equal Employment Opportunity Commission at 1 (800) 669-4000. The Chief Compliance Officer is responsible for creating and retaining reports, diaries, analyses, etc. of Alberici's specific efforts to monitor the work environment for the presence of any forms of harassment, intimidation, or coercion and to accept and investigate complaints should they occur. Alberici's harassment policy applies equally to employees, applicants for employment, and contract employees.

Supervisors and managers are annually made aware of their responsibility to carry out these obligations addressing the need to maintain a work environment free of harassment, intimidation, and coercion. When they observe or are informed of allegations of harassing conduct, they must act promptly and appropriately to address and mitigate harassing behavior. Alberici will take appropriate corrective action against a supervisor or management official who fails to report allegations of harassing conduct or perform their obligations as set forth in Alberici's Policy & Procedures. To the extent permitted by law, Alberici will take appropriate corrective action against individuals who engage in harassing conduct, which may include training or counseling, or disciplinary action up to and including removal, depending on the circumstances of the harassment. In certain circumstances, Alberici will determine whether to provide interim relief to employees who have been subjected to alleged harassing conduct while an inquiry is pending to ensure that further misconduct does not occur.

Filing a harassing conduct complaint does not replace an employee's EEO or other rights. You are not precluded from filing EEO complaints (or negotiated or administrative grievances) concerning allegations of harassment with government agencies, i.e., the Equal Employment Opportunity Commission, while also filing a harassing conduct complaint with Alberici.

As President and CEO, I am committed to creating an environment that encourages and supports all company personnel, including management, staff at all levels, non-career appointees, contract employees, and applicants to report when they experience, are witness to, or are made aware of alleged discriminatory, biased, or harassing conduct. When we work collectively towards empowering our employees, Alberici benefits. We will succeed in our efforts to eliminate harassment if we promote awareness, steadfastly commit to the principles of diversity, equity, inclusion, and accessibility, and take swift action to hold accountable those who engage in harassing behavior contrary to these articulated standards that improve our ability to serve the public.

A handwritten signature in black ink, appearing to read 'G. T. Hesser', written over a horizontal line.

Gregory T. Hesser, President and CEO