



## HARASSMENT FREE WORKPLACE POLICY

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Alberici must strive to be a model workplace, at all of its facilities, where employees are cultivated to their highest potential and treated equitably with respect. We achieve this most effectively when all employees, including those from historically underserved communities, such as Black, Latino, American Indian and Alaska Native, Asian Americans, Native Hawaiians, and Pacific Islanders, other persons of color, women, members of religious minorities, individuals who are disabled or LGBTQI+, and Veterans 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 address training and education needs of managers, supervisors, and employees in recognizing conduct that may be in violation of the Company's policy.

Alberici defines harassing conduct as any unwelcome verbal, written, or physical conduct that is based on race (including dress and grooming), color, ancestry, national origin (including ethnicity, accent, and use of a language other than English), 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, veteran status, political affiliation or any other prohibited factor, and/or retaliation for engaging in protected Equal Employment Opportunity (EEO) activity (e.g., filing or participating in a complaint or otherwise opposing discrimination, including harassment; requesting a reasonable accommodation). 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 the department will act with sensitivity and uphold confidentiality to the greatest extent possible.

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 they are 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



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promptly report the matter to a person in their supervisory chain, the Vice President of Human Resources at 314 733 2000 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 Vice President of Human Resources at 1 (314) 733-2000 or the Equal Employment Opportunity Commission at 1 (800) 669-4000. The Vice President of Human Resources 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. 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 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 the Policy & Procedures. To the extent permitted by law, Alberici will also 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, including the right to file a negotiated or administrative grievance. Employees are not precluded from filing EEO complaints (or negotiated or administrative grievances) concerning allegations of harassment while also filing a harassing conduct complaint with government agencies such as the Equal Employment Opportunity Commission.

As President & CEO of Alberici, 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 American public.

Richard Jaggers, President and CEO