

## **SECTION 1 – DIVERSITY**

### **Equal Employment Opportunity (EEO)**

ORC provides equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, amnesty or status as a covered veteran in accordance with applicable federal, state and local laws. ORC complies with applicable state and local laws governing nondiscrimination in employment in every location in which the company has facilities. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

ORC expressly prohibits any form of unlawful employee harassment based on race, color, religion, gender, gender identity, sexual orientation, national origin, age, genetic information, disability or veteran status. Improper interference with the ability of any ORC employees to perform their expected job duties is absolutely not tolerated. You may discuss equal employment opportunity related questions with Human Resources.

### **Affirmative Action**

ORC has been and will continue to be an equal opportunity employer. To assure full implementation of the equal employment policy, we will take steps to make sure that:

Persons are recruited, hired, assigned and promoted without regard to race, religion, color, national origin, citizenship, sex, sexual orientation, gender identity, veteran status, uniform service member status, age, disability or any other legally recognized protected personal characteristics.

Similarly, all other personnel actions, such as compensation, benefits, transfers, layoffs and recall from layoffs, access to training, education, tuition assistance and social recreation programs are administered without regard to race, religion, color, veteran status, uniform service member status, national origin, citizenship, sex, sexual orientation, gender identity, age, disability or any other legally recognized protected personal characteristics.

To ensure compliance, we have appointed Human Resources to assume the responsibility of ORC's EEO Manager. The EEO Manager will be responsible for the day-to-day implementation and monitoring of our Affirmative Action Plan. As part of that responsibility, the EEO Manager will periodically analyze ORC's personnel actions and their effects to ensure compliance with our equal employment policy. If you have questions about this policy, or would like to review our Affirmative Action Plan, please contact Human Resources.

The Leadership Team of ORC have reviewed and fully endorsed our Affirmative Action and Equal Employment Opportunity program. We ask for the continued assistance and support of all of ORC's employees to attain our objective of equal employment opportunity for all.

## **Americans with Disabilities Act ADA and the ADA Amendments Act (ADAAA)**

The Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act, known as the ADAAA, are federal laws that prohibit employers with (15) fifteen or more employees from discriminating against applicants and individuals with disabilities and that (when needed) provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of ORC to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is our company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

The company will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to ORC. Contact the Human Resources Department with any questions or requests for accommodation.

## **Anti-Harassment Policy and Complaint Procedure**

ORC is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, ORC expects that all relationships among persons in the office will be business-like and free of bias, prejudice and harassment.

It is the policy of ORC to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, amnesty or status as a covered veteran. ORC prohibits any such discrimination or harassment.

ORC encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of ORC to promptly and thoroughly investigate such reports. ORC prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

### **Definitions of Harassment**

**Sexual harassment** constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;

- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- Such 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 a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

**Harassment** on the basis of any other protected characteristic 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/her race, color, religion, gender, sexual orientation, national origin, age, disability, marital status, citizenship, genetic information, gender identity or any other characteristic protected by law or that of his/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 and that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment via e-mail (Instant Messaging), phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

ORC has a “zero tolerance” to any and all harassment whether it occurs, or is likely to occur on Company, client, vendor and supplier or third party provider premises.

### **Individuals and Conduct Covered**

These policies apply to all applicants and employees, whether related to conduct engaged in by fellow employees or someone not directly connected to ORC (e.g., client, supplier, vendor, consultant or third party provider).

Conduct prohibited by these policies 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.

## **Complaint Process**

ORC maintains a strong “Open Door Policy” and publishes this information on ORC SharePoint sites and in ORC Employee Handbooks. Individuals who believe they have been the victims of conduct prohibited by this policy statement or who believe they have witnessed such conduct should discuss their concerns with their immediate manager, Human Resources, any member of management or contact the Ethics hotline. When possible, ORC encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. ORC recognizes, however, that an individual may prefer to pursue the matter through complaint procedures. While employees may use any of the following reporting channels to report a concern, including those that involve conduct which potentially conflicts with ethical or legal obligations or company policies including the Code of Business Ethics and Conduct, employees are encouraged to start with the first reporting channel listed below. The employee’s manager and/or next level manager may be in the best position to assist and support an employee with his/her concerns in addition to being better suited to effectively and swiftly address certain types of concerns. Employees may use or escalate their concerns through the other channels if they are not comfortable using a particular reporting channel, or believe their concerns have not been adequately addressed after having raised the issue through a prior reporting channel.

### **ORC’s Reporting Channels:**

1. Talk directly with your Manager or next level manager
2. Contact Human Resources
3. Contact a member of the Leadership Team
4. Report the concern to the ORC’s Ethics Hotline (1.866.494.3161 ORC’s PIN Number: 4012), or website ([www.eniweb.com](http://www.eniweb.com)>DirectAccess Login>ORC’s PIN Number: 4012)

The Ethic’s Hotline is the Company’s ethics and compliance reporting line, which may be used anonymously. It is operated by an independent Third Party provider and can be accessed 24/7, 365 days a year through a toll free telephone number and/or a confidential website. Reports are investigated by a designated subject matter expert within or external to the Company.

Employees are encouraged to review the full EEO Harassment Policy on SharePoint in the Employee Toolbox.

## **Immigration Reform and Control Act**

In compliance with the federal Immigration Reform and Control Act of 1986 (IRCA), as amended, and any state law requirements, if applicable, our company is committed to employing only individuals who are authorized to work in the United States.

Each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9, and present documentation establishing identity and employment eligibility. If an employee is authorized to work in this country for a limited time period, the individual will be required to submit proof of renewed employment eligibility prior to expiration of that period to remain employed by the company.