

	EEO & Harassment Policy	
	Scope: Applies to ALL states	# of Pages: 4
<input checked="" type="checkbox"/> Policy <input checked="" type="checkbox"/> Procedure <input type="checkbox"/> Business Rule	Effective Date: January 2014	
Date Revised: January 2018		

Purpose: It is the policy of O. R. Colan Associates (including all of its affiliates and associated companies), “ORC” or “The Company”, to provide employees a workplace free of discrimination, harassment and bullying.

ORC provides equal employment opportunities (EEO) to all employees and applicants, and will comply with the regulations of Title VI of the Civil Rights Act of 1964, as amended, Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, as amended, The Vietnam Era Veteran’s Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212, and other nondiscrimination laws and authorities, that include regulations relative to nondiscrimination in federally-assisted programs of the Department of Transportation (DOT) Title 49, Code of Federal Regulations (CFR) and the Federal Highway Administration’s Title 23 Code of Federal Regulations 200. The Company practices “zero tolerance” and will not discriminate against any person on the basis of race, color, religion, gender, gender identity, sexual orientation, national origin, age, genetic information, disability, amnesty or status as a covered veteran in accordance with applicable federal, state and local laws.

ORC willfully complies with applicable state and local laws governing nondiscrimination in employment in every location in which the company has facilities or operates. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, fringe benefits and training.

Applying the same zero tolerance practice, ORC expressly prohibits any form of unlawful employee and/or applicant discrimination or 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 whether in an ORC facility, at a client, supplier or vendor or third-party provider location is absolutely not tolerated.

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 and Bullying are strictly prohibited and ORC has zero tolerance.

Under this policy, harassment is verbal, written or physical conduct that demeans 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 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; demeaning jokes; and written or graphic material that demeans 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.

Bullying, defined by the Healthy Workplace Bill, is the repeated, health-harming mistreatment of one or more persons (targets) by one or more perpetrators. Bullying tends to be a form of psychological abuse that can include:

- Language or behavior that frightens, humiliates, belittles or degrades the recipient or target may be part of a pattern of workplace bullying.
 - Persistent or egregious use of abusive, insulting, or offensive language
 - Aggressive yelling or shouting

- Unwarranted physical contact or threatening gestures
- Making repeated negative comments about a person's appearance, lifestyle, family, or culture
- Regularly inappropriately teasing or making someone the brunt of pranks or practical jokes
- Circulating inappropriate or embarrassing photos or videos via email or social media
- Behavior that undermines a person's work performance, working relationships, or perceived value in the workplace may also be part of a pattern of bullying.
 - Unnecessarily interrupting or disrupting someone's work; inappropriately interfering with a person's personal property or work equipment
 - Repeatedly discounting a person's statements in group meetings; unfavorably comparing one person to others
 - Blaming a person for problems they did not cause
 - Taking credit for another's contributions
 - Spreading misinformation or malicious rumors
 - Purposefully inappropriately excluding, isolating, or marginalizing a person from normal work activities
- When the bully is a supervisor, the pattern may also include:
 - Assigning tasks that are beyond a person's skill level
 - Establishing unrealistic timelines, or frequently changing deadlines
 - Denying access to information, consultation, or resources
 - Excessively monitoring an employee's work
 - Giving feedback in an insincere or disrespectful manner
 - Repeatedly reminding someone of past errors or mistakes
 - Inconsistently following or enforcing rules, to the detriment of an employee
 - Ignoring an employee, or isolating them from others
 - Denying equal access to earned time off

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., an outside vendor, consultant, customer 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.

Reporting: 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>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.

Investigating EEO, Harassment & Bullying Concerns: Any reported allegations of harassment, bullying, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. Information will only be disclosed as needed for legitimate business purposes, and is kept confidential to the extent possible. Employees and/or applicants may choose to report anonymously when using the Ethics Hotline and/or website. Employees that choose direct and interactive communication, talking with their immediate manager or to Human Resources, make it possible for the Company to gather additional relevant information that may be valuable in resolving the situation. ORC will take reasonable measures to protect the confidentiality and anonymity of the employee, if requested, to the fullest extent possible. Recognizing the Company's obligation to investigate and implement remedial actions, the Company cannot guarantee confidentiality.

Anti-Retaliation: ORC will not retaliate or permit any retaliation against an employee and/or applicant who reports any matter to the Company in good faith, even if the report does not lead to the discovery of a violation or other actionable issue.

Misconduct constituting harassment, bullying, discrimination or retaliation will be dealt with appropriately. If you believe that a manager or any member of management has acted inconsistently with this policy; or if you are not comfortable bringing a complaint regarding

harassment to your immediate manager; or if you believe that your complaint concerning a coworker, a customer, or a vendor has not been handled to your satisfaction -- please immediately contact Human Resources.

Conversely, employees who knowingly report inaccurate or dishonest information, fail to cooperate in an investigation, or threatens or intimidates others in an effort to influence their participation in an investigation may be subject to disciplinary action, up to and including termination of employment. Applicants who knowingly report inaccurate or dishonest information, fail to cooperate in an investigation, or threatens or intimidates others in an effort to influence their participation in an investigation will be removed from the applicant pool.

Cooperation includes the expectations that the employee and/or applicant:

- Promptly responds to investigations conducted by, or on behalf of the Company.
- Provides honest and complete information in response to questions/inquires for information.
- Employee and/or applicant is always expected to provide truthful and accurate information during any such investigation or inquiry.

Contractors and Subcontractors: The Company will not discriminate on the grounds of race, color, religion, gender, gender identity, sexual orientation, national origin, age, genetic information, disability or veteran status in the selection and retention of sub-consultants, including procurements of materials and leases of equipment. ORC will not participate either directly or indirectly in the discrimination prohibited by 49 CFR, Part 21.5.

In all solicitations, either by competitive bidding or negotiation made by the Company for work to be performed under a subcontract, including procurements of materials or equipment, each potential subcontractor or supplier shall be notified of their obligations under the contract and the regulations relative to nondiscrimination and harassment on the grounds of race, color, religion, gender, gender identity, sexual orientation, national origin, age, genetic information, disability or veteran status. ORC will include the necessary provisions in every subcontract; including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto.

Accommodations Availability: ORC's Human Resources Department can provide employees and/or applicants with additional information upon request. Special assistance for employees or applicants with disabilities or limited English proficiency, can contact Human Resources. Persons with hearing-and speech-impairments can contact ORC by using the Telecommunications Relay Service, a toll-free service for the deaf (TDD). Call 711 for TTY/TDD.