

National Anti-Harassment Policy

Caring for our people is always Turner's most important objective. We are dedicated to creating the right environment that is equitable, inclusive, and free from bias and hate, so we can be at our best at all times. Turner has zero tolerance for sexual and other unlawful harassment or discrimination by or against employees, applicants, temporary workers, gig workers, interns, volunteers, clients, independent contractors, vendors or non-employees of Turner (collectively, "Included Individuals") at a Turner work site or when you are involved in any Turner business relationship as part of your job.¹ Sexual and other unlawful harassment of employees or other individuals occurring in the workplace or in other settings in connection with their employment or engagement is unlawful and prohibited. This policy applies to all incidents of alleged harassment, including those which occur off premises or off-hours (including but not limited to at events, meetings, travel outside the office or work site, communications on personal devices, text or social media, or when working remotely including in virtual meetings or calls), and whether the alleged offender is a supervisor, manager, co-worker or even a third-party non-employee with whom you may be involved in any business or potential business relationship. This policy applies regardless of an individual's immigration status.

To maintain a workplace free from sexual and other unlawful harassment, the following procedures are in place to manage any such inappropriate conduct. Further, any retaliation against an individual who has complained about sexual or other unlawful harassment, or retaliation against individuals for cooperating with an investigation of a harassment complaint, is similarly unlawful. Turner is committed to a work environment where all are treated with respect and dignity. This is what we stand for, and anything less will not be tolerated.

Turner takes allegations of sexual and other unlawful harassment seriously. We will respond promptly to complaints of harassment or discrimination or and where it is determined that such inappropriate conduct has occurred, we will act to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual and other unlawful harassment or discrimination, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual or other unlawful harassment or otherwise violates this policy. Furthermore, the intent of someone's behavior is not a defense to violating this policy. The impact of the behavior is what matters.

SEXUAL HARASSMENT

Definition of Sexual Harassment

Turner specifically prohibits workplace sexual harassment, which it considers a form of employee misconduct. Workplace or work-related sexual harassment, including sex-based or gender-based discrimination is illegal under federal, state and local laws, and will not be tolerated by Turner. The prohibition against sexual harassment applies equally to all individuals regardless of their sex or gender identity. Sexual harassment includes harassment where the harasser and the victim are of the same or different sexes or gender identities.

¹ Issuance of this policy to a non-employee of Turner and/or coverage of a non-employee under this policy in no way creates any employment relationship between Turner and such individual. Furthermore, nothing in this policy in any way grants or confers any implied contractual right to any individual with respect to employment with Turner or alters any employment at-will status of a Turner employee.

Sexual harassment also includes harassment on the basis of sexual orientation, self-identified or perceived sex, gender expression, gender identity and transgender status. Understanding and respecting gender diversity is essential to an inclusive workplace and preventing sexual harassment.²

For the purposes of this policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example:

- (i) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or a third party's engagement;
- (ii) Submission to or rejection of such conduct is used as or threatened to be used as the basis for employment decisions affecting an individual's employment (such as favorable reviews, salary increases, promotions, increased benefits or continued employment); or
- (iii) Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive environment, even if the complaining individual is not the intended target of the sexual harassment.

Other sexually-oriented conduct, whether intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which, if unwelcome, may constitute sexual harassment, depending upon the totality of the circumstances:

- Unwelcome sexual advances, whether they involve physical touching or not;
- Requests for sexual favors in exchange for actual or promised job benefits, such as a favorable review, salary increase, promotion, etc.
- Sexual epithets, slurs, jokes, written or oral references to sexual conduct; gossip regarding one's sex life; comments on an individual's body, comments about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, cartoons;
- Leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Sending or circulating, whether in print or electronic form, literature or communications (articles, magazines or e-mails) of a sexual nature;
- Inquiries into one's sexual experiences;
- Discussion of one's sexual activities;
- Sex or gender-based stereotyping, i.e., judging a person's conduct or personality traits because they may not conform to others' ideas or perceptions about how individuals of a particular sex should act or look, including but not limited to: (a) remarks regarding an individual's gender expression; or (b) asking individuals to take on traditionally gendered roles;
- Other conduct directed toward a person because of their gender, gender identity, gender expression, or sexual orientation, including but not limited to: (a) intentional misuse of an individual's preferred pronouns or (b) creating different expectations for individuals based on their perceived identities;
- Other verbal or physical conduct of a sexual nature

² The three most common ways people may identify are: (1) cisgender (gender aligns with their sex assigned at birth, which generally aligns with the binary of male or female), (2) transgender (gender is different than the sex they were assigned at birth), and (3) non-binary (the person does not identify exclusively as man or woman; might identify as both, in between, or outside the gender binary).

Complaints of Sexual Harassment

Any of our employees or other included individuals who believe that they have been subjected to or witnessed sexual harassment, should promptly file a complaint, in writing or verbally, with a Turner Project Manager, Operations Manager, Project Executive, Department Head or Human Resources Director/Manager. These individuals are also available to discuss any concerns you may have and provide information about our policy on sexual harassment and complaint process. You can also raise the issue directly with a Turner business unit General Manager or equivalent senior executive, or Senior Human Resources Director. You may also follow Turner's internal complaint and grievance procedure to resolve complaints by contacting compliance@tcco.com or call The Network at 888-738-1924.

Any supervisor or manager who has reason to suspect harassment or retaliation is occurring must notify a Turner Human Resources Director/Manager.

Please be aware that early reporting and intervention have proven to be the most effective methods of resolving actual or perceived incidents of harassment. Turner expects prompt reporting of complaints or concerns so that rapid and constructive action can be taken. We will make every effort to stop alleged harassment, but can only do so with the cooperation of our employees.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it stop. Turner also encourages but does not require individuals who believe they are being harassed to promptly notify the offender that his or her behavior is unwelcome.

Retaliating against an individual who has complained about sexual harassment, and/or against individuals for cooperating with an investigation of a sexual harassment complaint, is unlawful and will not be tolerated by Turner. However, if after investigating any complaint of harassment, Turner determines that the complaint is frivolous and was not made in good faith, or that false information regarding the complaint was knowingly provided, disciplinary action may be taken against the employee who filed the bad-faith complaint or who knowingly gave the false information.

All complaints will be kept confidential to the maximum extent possible, and this confidentiality should be maintained whether employees are involved in the complaint or investigation or otherwise become aware of the complaint. There is a duty to report any conduct that they believe violates this policy. In addition, every employee and included individual has a duty to cooperate with any investigation conducted by Turner, regardless of whether the investigation is being conducted by Turner officials or outside parties retained for this purpose.

Bystander Intervention

In the event someone witnesses harassing behavior that violates this policy, there are bystander intervention methods that may be used, including letting the affected individual(s) know how to report the behavior by utilizing Turner's complaint procedures.³

Sexual Harassment Investigation

Complaints and allegations will be promptly investigated in a fair, timely, and thorough manner that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation may include a private interview with the person filing the complaint and with any witnesses. We may also interview the person alleged to have committed sexual harassment. When we have completed our investigation we

³ Employees may also interrupt the harassment by engaging with the victim and distracting them from the behavior, asking another party present to help intervene, and checking in following the incident.

may, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

If the result of the investigation indicates that corrective action is called for, such action may include disciplinary measures up to and including immediate termination of the employment of the offender (if a Turner employee) or other appropriate remedial measures (if the offender is not a Turner employee).

Turner's complaint and investigation process strives to maintain confidentiality to the extent practicable, provide timely responses, conduct impartial and timely investigations by qualified personnel, document and track investigations for reasonable progress, engage in appropriate options for remedial actions and resolutions, and provide for timely closures.

OTHER UNLAWFUL HARASSMENT

Turner strongly supports the rights of all its employees and included individuals to work in an environment free from all forms of unlawful harassment, including harassment on the basis of age, ancestry, ethnicity, color, religious creed (including religious dress and grooming practices), disability (mental and physical) including HIV and AIDS, marital status, familial status, partnership status, medical condition (cancer and genetic characteristics), genetic information, citizenship, military and veteran status (including protected veteran status and past, current, or prospective service in the uniformed services), national origin (including language use restrictions), race (including traits historically associated with race, including but not limited to hair texture and protected hairstyles), sex (which includes pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding), sexual and reproductive health decisions, gender (including gender nonconformity and status as a transgender or transsexual individual, gender identity, and gender expression), sexual orientation, caregiver status, criminal history, domestic violence victim status, and any other characteristic protected under applicable federal, state, or city law.

Unlawful harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of a protected characteristic, and that:

- (a) creates an intimidating, hostile or offensive working environment;
- (b) unreasonably interferes with an individual's work performance; or
- (c) otherwise adversely affects an individual's employment opportunities.

Unlawful harassing conduct includes, but is not limited to:

- epithets;
- slurs;
- negative stereotyping;
- threatening, intimidating or hostile acts that relate to a protected characteristic;
- written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of a protected characteristic, and that is placed on walls, bulletin boards, or elsewhere on the Turner's premises, or circulated in the workplace on paper or electronically.

Retaliation Is Prohibited

Unlawful retaliation can be any action that could discourage an employee or other included individual from coming forward to make or support a harassment or discrimination claim and is prohibited by federal, state, and local law.

Applicable law protects any individual who has engaged in "protected activity." Protected activity occurs when a person has: made a complaint of harassment or discrimination, either internally or with any government agency; participated in an investigation of a harassment or discrimination complaint; testified or assisted in a proceeding involving harassment or discrimination under applicable law; opposed unlawful harassment or discrimination by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of suspected harassment or

discrimination; reported that another employee or included individual has been harassed or discriminated against; or encouraged a fellow employee or included individual to report harassment or discrimination. Even if the alleged harassment or discrimination does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith belief that the practices were unlawful. However, this retaliation provision is not intended to protect persons making intentionally false charges of harassment or discrimination.

Examples of retaliation may include, but are not limited to:

- Implementing an unwarranted demotion or termination that is not based on a legitimate business and non-retaliatory reason;
- Issuing an unwarranted performance improvement plan or negative evaluation;
- Directing social isolation;
- Publicly releasing personnel files; or
- Undermining an individual's immigration status.

Retaliation against any employee for reporting discrimination or harassment, supporting another's complaint, or for participating in an investigation of a claim of discrimination or harassment is a serious violation of this policy and will result in the violator being subject to disciplinary action, up to and including termination of employment (if a Turner employee) or other appropriate remedial measures (if the offender is not a Turner employee). Further, retaliating against third parties who have complained about harassment or discrimination or cooperated in an investigation of a harassment or discrimination complaint is strictly prohibited under this policy.

Turner prohibits unlawful harassment, retaliation, and discrimination of any kind. Any violation of this policy should be reported in accordance with the complaint procedure in the Sexual Harassment policy and the complaint will be handled in the manner set forth in that procedure.

If the result of the investigation indicates that corrective action is called for, such action may include disciplinary measures up to and including immediate termination of the employment of the offender (if a Turner employee) or other appropriate remedial measures (if the offender is not a Turner employee).

Employee's Responsibility

- All employees and other included individuals should avoid contributing directly or indirectly to any form of harassment or discrimination in the workplace.
- Report any observed or potential harassment or discrimination promptly and confidentially to Turner management and/or to the Human Resources Director/Manager.
- Cooperate fully in any investigation in a discreet, confidential, and sensitive manner. Failure to cooperate may be grounds for disciplinary action.

Supervisor's Responsibility

- Maintain an open-door policy for employees to communicate potential concerns at an early stage and seek counsel from Turner's Human Resources Director/Manager.
- Take all complaints or concerns of alleged or possible harassment or discrimination seriously, no matter how minor or who is involved.
- Report any alleged incidents or receipt of formal complaints immediately to the appropriate management and to Turner's Human Resources Director/Manager.
- Cooperate fully in any investigation and maintain confidentiality to the extent possible.
- Take appropriate action to prevent retaliation or prohibited conduct from reoccurring during and after any investigations or complaints.

- Communicate support of the policy and guidelines throughout the organization.
- Make sure that all employees and other individuals within your area of responsibility are aware of this policy, ensure that personnel decisions are in compliance with this policy, and initiate corrective action (after consulting with Turner Human Resources Director/Manager, Operations Manager, Project Executive or the Senior Human Resources Director) when improper behavior is observed or reported.

Supervisors who knowingly allow or tolerate harassment, discrimination or retaliation are in violation of this policy and subject to disciplinary action.

Prevention Program

Avoidance of harassment, sexual harassment, and discrimination requires constant supervisory and management awareness. Publication of this policy reaffirms the Turner's desire to eliminate any form of harassment or discrimination. Anti-harassment training is provided to all employees throughout Turner annually, or as otherwise required by state or local law. The resulting work environment should be one sensitive to discrimination, harassment and sexual harassment issues and one positioned to prevent violations. We trust that all our employees will continue to act responsibly to establish and maintain a harassment-free and discrimination-free working environment.

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