

Anti-Harassment and Anti-Discrimination

Purpose

It is, and will continue to be, the policy of CDM Smith to provide equal employment opportunity to all employees and candidates for employment. The firm will assure that qualified applicants who are recruited and hired, and employees at all levels, are not discriminated against because of their race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, non-job-related criminal record or any other characteristic protected by the applicable provincial human rights law. CDM Smith will continue to promote the full realization of equal employment through a positive continuing program and by providing reasonable accommodation to qualified individuals with known disabilities, unless doing so would result in undue hardship.

To that end, CDM Smith has adopted a zero tolerance Harassment and Discrimination Policy that affirms the right of all employees to work in an environment free from discriminatory and/or harassing speech or behavior. CDM Smith is committed to eliminating or, if that is not reasonably practicable, controlling the hazard of harassment. CDM Smith will investigate any incidents of harassment and take corrective action to address the incidents.

It is a violation of CDM Smith's policy for any employee, whether a manager, supervisor or co-worker, to harass or discriminate against another person based on the individual's race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, non-job-related criminal record or any other characteristic protected by the applicable provincial human rights law. CDM Smith does not and will not tolerate such behavior.

It is also a violation of CDM Smith's policy for any employee or manager to engage in other types of inappropriate conduct or comment that: (i) adversely affects the targeted employee's psychological or physical well-being or (ii) the individual knows or ought to have known would cause the targeted employee to be humiliated or intimidated (i.e., workplace harassment or bullying). CDM Smith does not and will not tolerate such harassing behaviour and will take all reasonable steps to protect its employees from such misconduct, whether originating from another employee, a manager, or a third-party at the workplace or while the employee is conducting firm business off-premises or outside regular work hours.

Applies to

This policy applies to all CDM Smith Canada ULC employees and Canadian expatriates, outside vendors and clients.

Policy:

Workplace (includes in-person, virtual and/or telework) Harassment in any form- including quid pro quo sexual harassment, workplace bullying or discrimination against any individual based upon any protected group status, such as race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, non-job-related criminal record or any other characteristic protected by the applicable provincial human rights law- will not be tolerated at CDM Smith or any of its subsidiaries. Such conduct is a violation of the law and can subject the firm and individuals within the firm to civil liability and punitive damages. This type of behaviour is incompatible with the firm's values and counterproductive to our goals.

Preventing Sexual Harassment

- Unwelcome sexual advances, requests for sexual favors and other verbal, written or physical conduct of a sexual nature are prohibited, especially where:
- 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 the individual. Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.
- Men as well as women may experience sexual harassment. Moreover, harassment may occur between persons of the same sex.

Other Forms of Harassment

CDM Smith also has a zero-tolerance policy for other forms of harassment, including harassment based on prohibited grounds of discrimination. Harassment of employees in connection with the workplace by non-employees may also be a violation of this policy.

Complaint Procedure for Harassment and Discrimination

CDM Smith has a legal obligation to act on any reported or unreported incident of harassment or discrimination that comes to its attention. Therefore, in instances of harassment or discrimination, employees are strongly encouraged to follow the steps outlined below. The firm recognizes, however, that situations may exist in which an employee, for whatever reason, may feel unable to follow this procedure, in which case the employee is encouraged to contact their Human Resources business partner.

- If an employee feels that they are being harassed or discriminated against, or observes harassment or discrimination, they may choose to tell the person to stop; however, the employee is not required to do so.
- The employee should report the incidents to their manager, Human Resources, or contact the director of Human Resources at 1-800-243-2677. Managers are required to report the complaint to Human Resources immediately.
- If the employee's manager is the harasser or demonstrating discriminatory conduct, the employee should report the incidents to their Human Resources business partner, or contact the director of Human Resources at 1-800-243-2677.
- Any employee who experiences harassment or discrimination by a non-employee or who observes harassment or discrimination of an employee by a non-employee should

report such harassment or discrimination to their immediate supervisor or to Human Resources.

Once a complaint has been reported, a prompt and thorough investigation will be undertaken. Where necessary and/or appropriate, CDM Smith may request the immediate assistance of the police or other authorities. Notification and involvement of the complainant's manager will take place at the discretion of Human Resources and the Office of General Counsel. CDM Smith may alter work arrangements or place employees on temporary administrative leave until the investigation is completed or the situation is otherwise resolved. At the completion of the investigation, the investigator will prepare a report outlining the circumstances of the incident, the relevant findings of fact and conclusions, and any corrective action that has been or will be taken. CDM Smith will retain the report for at least two years after the incident.

Information to consider when reporting allegations of harassment, discrimination or retaliation:

- Basis for allegation (race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, non-job-related criminal record or any other protected class, retaliation, workplace harassment)
- Nature of the complaint (including dates, locations and specific details)
- Describe the nature of your working relationship with respondent
- Witnesses
- Documents or supporting evidence (if available)
- Note any time missed as a result of the discrimination/harassment/retaliation
- Note if this is the first time making an allegation against respondent
- Think about the remedy you would like to see occur

All employees are protected under provincial law against retaliatory behavior directed against them by the harasser or others as a result of filing a harassment or discrimination complaint.

Employees are not required by law to confront an individual engaging in harassment or discrimination. However, in the event an employee chooses to do so, the following actions are recommended:

- Clearly and firmly tell the individual to stop the harassing or discriminatory activity.
- Inform the individual that more serious action will be taken if the behavior does not cease immediately.
- Maintain detailed records of the harassment or discrimination, including dates, times and places, as well as the names of witnesses and other relevant information. Store records in a safe place outside the work environment.
- If, after the individual has been confronted, the behaviour continues, report the incidents.

Employees who are exposed to workplace harassment and suffer an injury or other adverse symptom as a result may also wish to consult a healthcare professional for treatment or an appropriate referral or contact the Employee Assistance Program (EAP) for resources and/or care.

Accountability

While the office of the chairman has overall responsibility for this policy, and the director of Human Resources oversees its implementation and daily administration, all CDM Smith managers must provide for its enforcement in their individual units. CDM Smith managers are

also responsible for assisting in the expeditious and professional investigation and processing of employee complaints, as well as for actively working to prevent and eliminate harassment and discrimination at all levels of the firm.

At the individual level, an employee is encouraged to report any incident of harassment or discrimination that they witness directly to their manager or to Human Resources. Should an employee become indirectly aware of harassment or discrimination against another employee, they are encouraged to report the incidents directly to Human Resources.

CDM Smith management will maintain the highest possible degree of confidentiality with respect to such complaints, consistent with the law and CDM Smith's responsibility to fully investigate and attempt to resolve the situation.

CDM Smith will not disclose the circumstances related to an incident of harassment or the names of the complainant, the person alleged to have committed the harassment and any witnesses, except where necessary to investigate the incident or to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident, or as required by law.

This policy is not intended to discourage a worker from exercising rights pursuant to any other law.

Disciplinary Action

CDM Smith will not tolerate harassment or discrimination of or by its employees, outside vendors or clients. Such behavior undermines the integrity of the workplace, interferes with work performance and demeans its victims. Harassment and discrimination constitute a severe infraction of CDM Smith's policies and, as such, are grounds for disciplinary action, up to and including termination of employment for cause.

As noted above, no reprisal will be taken against any employee for complaints made in good faith. Retaliation against any employee for making a good faith complaint of discrimination or harassment, or for initiating or participating in an investigation is strictly prohibited. Individuals who engage in such conduct will also be subject to disciplinary action, up to and including termination of employment for cause.

Mandatory Training

All new CDM Smith employees must complete training to prevent sexual harassment. All current CDM Smith employees must renew their training on sexual harassment annually.