

Anti-Harassment/Anti-Discrimination

Purpose:

To create and maintain a work environment in which people are treated with dignity, decency and respect.

Applies to:

All CDM Smith entities, its operating groups, subsidiaries, and any affiliated entities, all located in the United States (the Company). This policy also applies to U.S. expatriates.

Definitions:

Adverse Employment Action: An action would be considered an adverse employment action if a reasonable employee would have found the action materially adverse, which means it might have dissuaded a reasonable worker from making or supporting a charge of discrimination or harassment. Examples of adverse actions may include layoff, demotion, unfavorable work assignments, etc.

Discrimination: The unjust treatment of individuals on the basis of protected characteristics.

Harassment: The verbal or physical conduct based on a protected characteristic that creates an intimidating, hostile or offensive working environment or that interferes with an individual's work performance. Harassment includes, but is not limited to, disparaging remarks, jokes, written or graphic material that is aimed at disparaging someone based on a protected characteristic.

Protected Characteristics: These are characteristics protected by applicable law that include, but may not be limited to, the following: race, color, religion, sex (including pregnancy, pregnancy-related conditions, childbirth and related medical conditions, sexual orientation, gender identity or gender expression) national origin, age, marital status, disability, veteran status, citizenship status, or genetic information.

Retaliation: A employee is subjected to an adverse employment action because they filed a harassment and/or discrimination complaint or because they have testified, assisted, or participated in any manner in an investigation, proceeding, or hearing related to the complaint.

Policy:

- I. CDM Smith has adopted an anti-harassment/anti-discrimination policy that affirms the right of all employees to work in an environment free from discrimination or harassment. It is the policy

of CDM Smith not to discriminate against any individual on any basis prohibited by law and not to tolerate harassment on any such basis.

- II. Discrimination and harassment in any form are not tolerated at CDM Smith.
- III. Discriminatory conduct is a violation of the law and can subject the firm and individuals within the firm to civil liability and punitive damages. Discrimination is incompatible with the firm's values and counterproductive to our goals.
- IV. Harassment and/or discrimination of employees by/or towards non-employees/suppliers in connection with the workplace will not be tolerated.
- V. **Preventing Sexual Harassment**
 - A. While all forms of discrimination and harassment are prohibited, it is important to describe the protection against sexual harassment in greater detail since it is often misunderstood and has a special legal definition. Inappropriate sexual harassment may occur in the form of unwelcome sexual advances, requests for sexual favors and other verbal, written or physical conduct of a sexual nature, or quid pro quo.
 - B. In addition, such conduct is illegal where the following may occur:
 - i. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
 - ii. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual.
 - iii. 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.
 - iv. Men, as well as women, may experience sexual harassment. Moreover, harassment may occur between persons of the same sex.
- VI. **Complaint Procedure for Harassment and Discrimination**
 - A. 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.
 - i. If an employee feels they are being harassed or discriminated against, they may choose to tell the person to stop; however, the employee is not required to do so. The employee is required to report any incidents to either their direct manager, HR business partner, the Corporate Employee Relations Manager, or any member of management, the Chief Human Resources Officer, the Office of General Counsel or the Chief Compliance Officer (Compliance@cdmsmith.com). You may also make a report via CDM Smith's Compliance and Ethics Integrity Line, a confidential reporting system, at www.cdmsmith.ethicspoint.com. Managers are required to report the complaint to their HR business partner, the Chief Human Resources Officer, the Office of General Counsel or the Chief Compliance Officer.

- ii. If the employee's manager is the harasser or engaging in discriminatory conduct, the employee is required to report the incidents to their HR business partner, the Corporate Employee Relations Manager, or any member of management, the Chief Human Resources Officer, the Office of General Counsel or the Chief Compliance Officer (Compliance@cdmsmith.com). You may also make a report via CDM Smith's Compliance and Ethics Integrity Line, a confidential reporting system, at www.cdmsmith.ethicspoint.com. Managers are required to report the complaint to their HR business partner, the Chief Human Resources Officer, the Office of General Counsel or the Chief Compliance Officer.
- iii. Any employee who experiences harassment or discrimination by a non-employee or who directly observes harassment or discrimination of an employee by a non-employee should report such harassment or discrimination to either their direct manager, HR business partner, the Corporate Employee Relations Manager, or any member of management, the Chief Human Resources Officer, the Office of General Counsel or the Chief Compliance Officer (Compliance@cdmsmith.com). You may also make a report via CDM Smith's Compliance and Ethics Integrity Line, a confidential reporting system, at www.cdmsmith.ethicspoint.com. Managers are required to report the complaint to their HR business partner, the Chief Human Resources Officer, the Office of General Counsel or the Chief Compliance Officer.
- iv. The Company recognizes, however, that situations may exist in which an employee, for whatever reason, may feel unable to follow the aforementioned procedures, in which case the employee is encouraged to contact the Corporate Employee Relations Manager at 1-800-243-2677 or the CDM Smith Compliance and Ethics Integrity Line at 1-844-330-7087. Please note that when calling the Integrity Line, the employee needs to provide sufficient details for an investigation to be conducted.
- v. Once a complaint has been reported, an investigation will be undertaken. Notification and involvement of the complainant's manager will take place at the discretion of Compliance, Human Resources and/or the Office of General Counsel.
- vi. All employees are protected under federal and state law against retaliatory behavior directed against them by the harasser or others as a result of filing a harassment or discrimination complaint.
- vii. Information to consider when reporting allegations of harassment, discrimination or retaliation:
 1. Basis for allegation (race, color, religion, sex [including pregnancy, pregnancy-related conditions, childbirth and related medical conditions, sexual orientation, gender identity or gender expression], national origin, age, marital status, disability, veteran status, citizenship status, genetic information or any other protected class, retaliation)
 2. Nature of the complaint (including dates, locations and specific details)
 3. Describe the nature of your working relationship with respondent and/or witnesses

4. Documents or supporting evidence (if available)
 5. Note any time missed as a result of the discrimination/harassment/retaliation
 6. Note if this is the first time making an allegation against respondent
 7. The remedy that is sought
- B. Employees are not required by law to confront a harasser. However, in the event an employee chooses to do so, the following actions are recommended:
- i. Clearly and firmly tell the harasser to stop the harassing activity.
 - ii. Inform the harasser that more serious action will be taken if the behavior does not cease immediately.
 - iii. Maintain detailed records of the harassment, 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.
 - iv. The employee is required to report the incident. In the report, they must indicate when they confronted the individual and whether or not the harassing activity stopped.

VII. Accountability

- A. While the Executive Leadership Team has overall responsibility for this policy, and the Chief Human Resources Officer 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 processing of employee complaints, as well as for actively working to prevent and eliminate harassment and discrimination at all levels of the firm.
- B. At the individual level, an employee is encouraged to report any incident of harassment or discrimination that they may witness directly to either their direct manager, HR business partner, the Corporate Employee Relations Manager, or any member of management, the Chief Human Resources Officer, the Office of General Counsel or the Chief Compliance Officer (Compliance@cdmsmith.com). You may also make a report via CDM Smith's Compliance and Ethics Integrity Line, a confidential reporting system, at www.cdmsmith.ethicspoint.com. If for some reason, the employee feels unable to follow the aforementioned procedures, the employee is encouraged to contact the Corporate Employee Relations Manager at 1-800-243-2677 or the CDM Smith Compliance and Ethics Integrity Line, a confidential reporting system, at 1-844-330-7087. Managers are required to report the complaint to their HR business partner, the Chief Human Resources Officer, the Office of General Counsel or the Chief Compliance Officer.
- C. 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 resolve the situation.

VIII. **Disciplinary Action**

- A. 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, is grounds for disciplinary action, up to and including dismissal.

IX. **Mandatory Training**

- A. All new CDM Smith employees must complete training to prevent workplace harassment. All current CDM Smith employees, must renew their training on workplace harassment every two years and/or when specifically directed by management, unless otherwise required by law.

X. **State and/or City Required Information**

- A. Certain states and/or cities have additional information to consider about employee rights as it relates to protected classes. Please see information below for that state and/or city specific information:

- i. New York Employees

- 1. CDM Smith will not discriminate or retaliate against an employee because of the employee's or a dependent of the employee's reproductive health decision-making, including the use of particular drugs, devices or medical services. CDM Smith also will not, without prior informed written consent, access personal information regarding the reproductive health decision-making of employees or their dependents and will not require an employee to sign any document or waiver denying that employee the right to make their own reproductive health decisions.
 - 2. Employees subjected to unlawful discrimination or retaliation on the basis of reproductive health decision-making can bring an action in court and may be entitled to certain remedies, including monetary and injunctive relief.

- ii. New York City Employees

- 1. The *New York City's Human Rights Law* prevents discrimination in the employment context based on an individual's age, race, national origin, immigration or citizenship status, color, disability, gender (including sexual harassment), gender identity, marital status and partnership status, pregnancy and lactation accommodations, caregiver status, sexual and reproductive health decisions, religion/creed, uniformed service, sexual orientation, and an individual's height, weight, or both.