

Harassment-free Workplace

AECOM is committed to providing a productive work environment characterized by mutual respect and free from any type of discrimination, including harassment, or abusive conduct including, but not limited to that of a sexual nature, “bullying” or other intimidating behavior, threat or assault.

We maintain a strict policy prohibiting harassment, including sexual harassment, in the workplace by any employee or by third parties such as customers, clients, vendors or visitors. Harassment may include unwelcome or unsolicited speech or conduct based upon race, sex, pregnancy, age, ancestry, military or veteran status, color, religion, creed, disability, marital status, medical condition, genetic information, national origin, gender, gender identity, gender expression, sexual orientation, citizenship status or any other characteristic protected by state, federal or local law and applicable laws in those countries outside the U.S. where AECOM employees have been assigned to work.

Sexual Harassment

Federal law defines sexual harassment as unwanted sexual advances; requests for sexual favors; or visual, verbal, or physical conduct of a sexual nature, including when:

- submission to such conduct is made a term or condition of employment.
- submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual.
- such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive work environment.

The following are examples of conduct that is prohibited by AECOM's policy against sexual harassment:

- Unwanted sexual advances
- Offering employment benefits in exchange for sexual favors
- Making or threatening reprisals after a negative response to sexual advances
- Visual conduct, such as leering, sexual gestures and displaying sexually suggestive objects, pictures, cartoons, calendars or posters
- Verbal conduct, such as making or using derogatory comments, epithets, slurs, sexually explicit jokes or comments about an employee's body or dress in a sexual context or with sexual overtones
- Verbal sexual advances or propositions
- Verbal abuse of a sexual nature, graphic and/or excessive verbal commentaries about an individual's sexual experiences or activities
- Written communication of a sexual nature, such as suggestive or obscene letters, emails and notes
- Accessing sexually explicit, pornographic and/or socially offensive websites, chat rooms or other material on the internet or via Company resources
- Physical conduct such as unwanted or suggestive touching, assault or impeding or blocking movement
- Submission to such conduct is made a term or condition of employment.
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive work environment

Workplace Harassment

Workplace harassment is unwelcome conduct that is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile or abusive and is typically based on race, sex, pregnancy, age, ancestry, military or veteran status, color, religion, religious creed, disability, marital status, medical condition, genetic information, national origin, gender, gender identity, gender expression, sexual orientation or any other characteristic protected by federal, state or local law. Workplace harassment may include, but is not limited to:

- Offensive jokes, slurs, epithets or name calling
- Physical assaults or threats, intimidation, ridicule or mockery
- Insults or put-downs
- Offensive objects, pictures, graffiti or written material
- Offensive graffiti created at a worksite or office location is a form of workplace harassment. Workplace graffiti, created on or off Company time, not only defaces Company property, but also constitutes an unauthorized use of Company time, property and materials, and will not be tolerated.

Workplace harassment does not include any reasonable action taken by management related to employee performance.

All employees are responsible for maintaining a respectful workplace free of harassment, discrimination and any other type of offensive or intimidating conduct. We strongly encourage the prompt reporting of all incidents of discrimination or harassment. If you believe you are being harassed or have witnessed harassment, or have been discriminated against in any way, you should inform your supervisor or Human Resources representative immediately. Employees may also use the AECOM Ethics Hotline 1-888-299-9602 or 1-770-613-6332 (outside of the U.S.) or email AECOMethics.hotline@tnwinc.com to report incidents of discriminatory, harassing or retaliatory conduct in the workplace or any other violation of Company policies.

Any manager/supervisor who knows of, or thinks he or she knows of, or witnesses a potential violation of this policy, has an added responsibility to act and must notify Human Resources immediately.

AECOM will take appropriate disciplinary action, up to and including termination of employment, if: (a) an employee is determined to have violated this policy; (b) an employee files a false complaint or provides false information regarding a complaint; (c) an employee fails to fully cooperate in the investigation of a complaint of alleged discrimination, harassment, retaliation or other noncompliant behavior; or (d) an employee retaliates against another employee for complaining of harassment or discrimination, or participating in an investigation related to a complaint of harassment or discrimination.