Policy

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, -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

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:

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,

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

- 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