



DISCRIMINATION & HARASSMENT POLICY

Human Resources

Policy Number: CG-HR-POL-110

Revision: November 25, 2019

Approved: Centuri Officers



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Description of Change

Revision

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2013.00
(June 1, 2013)

First Approved Issue

2012.01
(September 13, 2012)

Updated to add more classifications

2018.02
(January 31, 2018)

Added reporting enhancements and resources

June 12, 2019

Updated from Centuri Construction Group to Centuri Group. Also, format.

November 25, 2019

Updated to clarify included protected statuses.

I. PURPOSE

The Centuri Group is committed to creating and maintaining an environment free of unlawful discrimination, harassment and retaliation. Employees should treat individuals with whom they come in contact professionally and should recognize that others may perceive their actions differently from what was intended.

II. SCOPE

This policy applies to all persons involved in the operations of the Centuri Group and its subsidiaries (“Centuri” or “Company”) and prohibits unlawful discrimination, harassment and retaliation by any employee or agent of the Company. The policy also prohibits unlawful harassment of or unlawful discrimination against visitors, clients, vendors, and other service providers at our facilities. Nothing in this policy is intended to discourage or otherwise prevent the Company’s employees from exercising their legal rights pursuant to applicable federal, state, provincial or local law. The employment terms set out in this policy work in conjunction with, and do not replace, amend or supplement any terms or conditions of employment stated in any collective bargaining agreement that a union has with applicable Company subsidiaries. Whenever employment terms in this policy differ from the terms expressed in the applicable collective bargaining agreement, employees should refer to the specific terms of the collective bargaining agreement, which will control.

III. POLICY

The Company prohibits unlawful discrimination and harassment in any work-related setting, whether on Company premises, business-related travel or events, based on any actual or perceived protected classification. We do so not only to abide by law (federal, state, provincial – and, for certain characteristics, local) but it makes good business sense as well – we seek qualified talent without regard to such legally-protected characteristics as race, color, religion, national origin, sex (including gender, pregnancy, and pregnancy related conditions), age, disability, or status as an active duty service member or veteran, and without regard to gender identity or expression, transgender status, sexual orientation, unemployment status, citizenship or familial/marital status, or any other basis prohibited by applicable law. The Company will not tolerate words or actions that signify any kind of unlawful discrimination or unlawful harassment and is firmly committed to taking all reasonable steps to prevent its occurrence.

Prohibited unlawful discrimination or unlawful harassment is not necessarily limited to the loss of a job or other economic benefit. Prohibited discrimination or harassment based on a protected characteristic that impairs your working ability or emotional well-being at work violates this policy and will not be tolerated.

Examples of unlawful discrimination or harassment based on a protected characteristic include but are not limited to:

- Sexually or racially derogatory or lewd comments, verbal or written;
- Degrading jokes, slurs or statements, verbal or written;
- Negative stereotyping;
- Violent, derogatory, harassing, threatening or intimidating posters, photography, cartoons, drawings and gestures;
- Unwanted sexual advances, invitations, and comments, verbal or written;
- Unwanted touching or blocking of normal movement;
- Interference with work directed at you because of your sex or any other protected basis;
- Threats and demands to submit to sexual requests in order to keep your job or avoid some other loss;
- Offering employment or job benefits in return for sexual favors;
- Retaliation for opposing, reporting, or threatening to report unlawful harassment; or
- Retaliation for participating in an investigation, proceeding, or hearing regarding prohibited discrimination or unlawful harassment, either as a witness or a participant.

This policy also prohibits abusive conduct and bullying. “Abusive conduct” is conduct of an employer or employee in the workplace, with malice, that a reasonable person would find hostile, offensive, and unrelated to the employer’s legitimate business interests. Abusive conduct may include repeated infliction of verbal abuse, such as the use of derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person’s work performance. A single act does not constitute abusive conduct unless especially severe and outrageous. “Bullying” means persistent, offensive, abusive, intimidating or insulting behavior or unfair actions directed at another individual, causing the recipient to feel threatened, abused, humiliated, or vulnerable.

Reasonable action taken by a supervisor related to management or direction of Company employees (e.g., managing performance, assigning work, or reasonable disciplinary actions), expressing differences of opinion, or offering constructive feedback or guidance about work-related behavior generally do not constitute abusive conduct or bullying.

Both abusive conduct and bullying can take place through electronic means (e.g., computer, mobile device, text, e-mail, or social media) and violates this policy.

Non-Retaliation/Non-Retribution

The Company believes employees should be able to express their problems, concerns, opinions, and their points of view. The purpose is to foster an atmosphere in which employees feel comfortable knowing they can communicate problems, concerns, and opinions without fear of retaliation or retribution.

An employee, who in good faith, seeks advice, raises a concern or reports a violation is meeting the Company's expectation – we support such action and will not discharge, demote, suspend, threaten, harass, or in any manner discriminate or retaliate against any employee with respect to good faith reporting. If you feel you're the victim of retaliation, please contact Human Resources or the Compliance Officer as listed below. However, anyone who uses this Code or any compliance activity to spread knowingly false accusations, unlawfully threaten others, or fraudulently damage another person's reputation may be subject to disciplinary action, up to and including termination.

Reporting

If you are subject to any conduct that you believe violates this policy or witness any such conduct, you must promptly report the conduct, either orally or in writing. Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. The Company is committed to enforcing this policy. The effectiveness of these efforts depends in part on employees timely and fully reporting inappropriate workplace conduct. If employees do not report such conduct, the Company may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

The Company will ensure that a fair, timely and, thorough investigation is conducted by qualified personnel in an impartial manner that provides all parties with appropriate due process and reaches reasonable conclusions based on the evidence collected. At the close of the investigation, the Company will consider appropriate options for remedial actions and resolutions. If misconduct is found, the Company will take prompt, corrective action, as appropriate. Confidentiality will be maintained to the extent possible. You will be informed when the investigation is complete.

If you have a concern or a concern is brought to your attention, the Following resources are available to you:

Your Supervisor or Manager

Employees are encouraged to speak with their supervisor or manager regarding any concerns. The Company values open and honest communication and is interested in discussing any issue which is important to our employees.

Human Resources (“HR”)

Please feel free to contact Human Resources to discuss any concerns or questions you may have. HR has detailed knowledge of the Code, policies, and procedures.

EthicsPoint™ (the “Hotline”)

The Company provides the Hotline for employees to securely and confidentially report unethical behavior and noncompliance with laws, regulations, and Company policies and procedures. The Hotline also provides employees with an option to report anonymously so they may disclose genuine concerns in a comfortable manner without feeling threatened. The Hotline may be accessed by:

- Phone: 855.722.2816
- Online: www.MyNPL.Ethicspoint.com

Compliance Officer

Please feel free to contact the Compliance Officer, with any questions regarding the Code, your own compliance with the Code, or any potential violations of the Code, at:

- Phone: 623.879.3904
- Email: complianceofficer@NextCenturi.com

QUESTIONS OR CONCERNS?

If you have any questions or concerns about the policy, please contact Human Resources or the Compliance Officer

The Company encourages all individuals to report any incidents of harassment or other prohibited conduct forbidden by this policy immediately to the Company so that complaints can be quickly and fairly resolved. You also should be aware that the Federal Equal Employment Opportunity Commission (“EEOC”) has the authority to accept and investigate complaints of prohibited harassment and discrimination in employment and to mediate settlements. Additionally, state

agencies, including the California Department of Fair Employment and Housing (“DFEH”), may have authority to issue accusations against employers, conduct formal hearings, and award affirmative relief. State and federal law also prohibit retaliation against employees because they have filed a complaint with the EEOC or DFEH, participated in an investigation, proceeding, or hearing with either agency, or opposed any unlawful discriminatory practice. If you think you have been harassed or that you have been retaliated against for resisting or complaining, you may file a complaint with the appropriate agency. The nearest office can be found by visiting the agency websites at www.eeoc.gov and www.dfeh.ca.gov.

IV. ROLES AND RESPONSIBILITIES

Responsible Party	Action
Employees	<ul style="list-style-type: none"> • Ensure they have read and understand this policy. • Ensure that they treat individuals professionally. • Speak with someone if they are concerned with any behavior directed at them or others.
Leaders and Manager	<ul style="list-style-type: none"> • Ensure that the company maintains a professional workplace. • Providing a safe workplace for employees. • Immediately report any harassment complaint from an employee to Human Resources
Human Resources	<ul style="list-style-type: none"> • Assist in any investigation of misconduct.
Compliance Officer	<ul style="list-style-type: none"> • Investigate any reports of unethical behavior or violations of code.