

Business Management System Policy		Document No: JJ-EB-PL-6820-JJ	Page: 1 of 10
No Harassment, Discrimination, Bullying, and Violence		Effective Date: 28-MAY-2021	Rev. No: 4
Issuing Process: Human Resources	Process Owner: Global Human Resources Process Owner	Date Last Reviewed: 28-MAY-2021	

1.0 PURPOSE:

To provide the Company Policy for ensuring, promoting, and maintaining a Workplace environment free from all forms of Harassment, Discrimination, Bullying, and Violence.

To ensure education of employees, and to encourage and/or require employees and managers to report concerns or complaints in order to prevent Harassment, Discrimination, Bullying, and Violence in the Workplace or which has an effect upon the Workplace.

2.0 SCOPE OF APPLICATION:

2.1 Processes:

2.1.1 Other BMS processes that interact with, are impacted by, or interrelate with this Policy:

- a. Legal;
- b. Ethics and Compliance;
- c. Global Security and Resilience (GS&R); and
- d. Health, Safety, and Environment (HSE).

2.1.2 Sub-Processes: None.

2.2 Individuals/Organizations:

2.2.1 Internal: Employees of Jacobs Engineering Group Inc. and all of its subsidiaries, unless otherwise excluded below.

2.2.2 External: Third parties on Jacobs premises, job applicants, temporary workers, contractors, vendors, consultants, customers, and visitors.

2.3 Exclusions:

2.3.1 Internal: None.

2.3.2 External: None.

3.0 REFERENCES:

3.1 GPS01-103-15, Whistleblower.

3.2 JJ-CE-PL-9000-JJ-H-01, Code of Conduct.

3.3 JJ-EB-PL-6230-JJ, Employment of Relatives.

3.4 JJ-EB-PR-6800-JJ, Performance and Behavior Improvement Discussions.

3.5 JJ-HS-WI-0400-JJ, HSE&S Incident Management.

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- 3.6 JJ-QL-PR-0050-JJ, Deviations.
- 3.7 JJ-SU-PL-9600-JJ, Firearms and Weapons.

4.0 DEFINITIONS:

4.1 Global BMS Glossary.

4.2 Bullying: Offensive, intimidating, malicious or insulting behavior in the Workplace (as defined herein) involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation. Bullying can take the form of physical, verbal, and non-verbal conduct, including but not limited to:

- 4.2.1 Physical bullying. Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property.
- 4.2.2 Verbal bullying. Slandering, ridiculing, or maligning a person or their family; persistent name-calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- 4.2.3 Gesture bullying. Nonverbal gestures that can convey threatening messages.
- 4.2.4 Exclusion. Socially or physically excluding or disregarding a person in work-related activities.
- 4.2.5 In addition, depending on the surrounding circumstances and facts, the following examples may constitute or contribute to evidence of bullying in the workplace:
 - a. Persistent singling out of one person or group of persons.
 - b. Shouting or raising one's voice at an individual or individuals in public or in private.
 - c. Using obscene or intimidating gestures.
 - d. Persistently and regularly not allowing another person to speak or express themselves (i.e., ignoring or interrupting).
 - e. Personal insults and use of offensive nicknames.
 - f. Public humiliation in any form.
 - g. Constant criticism on matters unrelated or minimally related to the person's job performance or description.
 - h. Spreading rumors and gossip regarding individuals.
 - i. Manipulating the ability of someone to do their work (e.g., overloading, underloading, withholding information, setting deadlines that cannot be met, giving deliberately ambiguous instructions).
 - j. Deliberately excluding an individual or isolating them from work-related activities, such as meetings.
 - k. Unwanted physical contact, physical abuse, or threats of abuse to an individual or an individual's property (defacing or marking up property).
- 4.2.6 Legitimate, reasonable, and constructive criticism of a colleague's performance or behavior, or reasonable instructions given to workers during their employment, will not amount to Bullying on its own.

4.3 Harassment or Discrimination: Includes verbal, physical, and visual conduct that creates an intimidating, offensive, abusive, or hostile work environment or that interferes with work performance. Harassment or Discrimination also includes, but is not limited to, any derogatory or inappropriate treatment directed toward an individual because of (1) race, (2) religion, (3) creed, (4) color, (5) national origin, (6) ancestry, (7) sex (including pregnancy, childbirth, breastfeeding, or medical conditions related to pregnancy, childbirth, or breastfeeding), (8) age, (9) medical condition, (10) marital or domestic partner status, (11) sexual orientation, (12) gender, (13) gender identity, (14) gender expression and transgender status, (15) mental disability or physical disability, (16) genetic information, (17) military or veteran status, (18) citizenship, (19) low-income status, or (20) any other status or characteristic protected by applicable law. Persons may be harassed even if they are not the intended target. For example, a person may be harassed by racist jokes about a different ethnic group if they create an offensive environment for them.

4.3.1 Harassment or Discrimination includes but is not limited to:

- a. Verbal conduct such as epithets; offensive or derogatory comments; unusual comments about appearance or dress; racial slurs or comments, or offensive or derogatory ethnic jokes; or unwanted sexual advances, invitations, or comments.
- b. Visual conduct such as offensive or derogatory posters, cartoons, drawings, or gestures, also to include internet, e-mail, social media, and any other form of communication.
- c. Unwanted and inappropriate physical contact or horseplay, including touching, pinching, pushing, grabbing, impeding or blocking normal movement, unnecessary brushing against someone, invading personal space, physical or sexual assault, or interference with work directed at an individual because of gender or another protected status.
- d. Unwelcome sexual advances, suggestive behavior, threats, demands, and requests for unwanted sexual favors such as a sexual request in order for an individual to keep their job or avoid some other loss, or an offer of job benefits in return for sexual benefits/favors or a suggestion that a refusal will hinder their career.
- e. Retaliation, which is adverse action taken against an individual, for having resisted or rebuffed Harassment or Discrimination, reported Harassment or Discrimination, or participated in an investigation regarding Harassment or Discrimination.
- f. Stalking or pestering a person with unwanted attentions, gifts, or messages.
- g. Mocking, mimicking, or belittling a person's religion, mental or physical disability or age.
- h. Sending or displaying material that is pornographic or that reasonable people find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the Internet).
- i. Offensive or intimidating comments or gestures, or insensitive jokes or pranks that undermine the dignity of the person.
- j. Racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic, social, linguistic, or religious group, or gender.

- k. Outing or threatening to out someone on the basis of sexual orientation or transgender status
 - l. Shunning someone, for example, by deliberately excluding them from a conversation or a Workplace social activity, on the basis of the person's protected status or characteristic.
- 4.4 Jacobs: Jacobs Engineering Group Inc. and its subsidiaries (collectively, "Jacobs" or "the Company").
- 4.5 Policy (capitalized): Used within a given Jacobs policy document (e.g., "this Policy") refers to that specific policy document.
- 4.6 Sexual Harassment: Sexual Harassment is a form of Harassment and Discrimination (and thus is included within the definition of Harassment and Discrimination), and includes any unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when any of the following occur:
 - 4.6.1 Submission to the conduct is made either an explicit or implicit term or condition of employment.
 - 4.6.2 Submission to or rejection of the conduct is used as the basis for employment decisions affecting the individual.
 - 4.6.3 The conduct has the effect of unreasonably interfering with an individual's work performance or opportunities or creating an intimidating, hostile, or offensive work environment.
 - 4.6.4 Depending upon the circumstances, Sexual Harassment conduct may include, but is not limited to:
 - a. Unwanted sexual advances, reprisals or making Threats (as defined herein) of reprisals after a negative response to sexual advances, or pressure (subtle or otherwise) for sexual activity, and continued suggestions for dating, romance, or social activity after it has been made clear that the suggestions are unwelcome.
 - b. Verbal proposition(s), sex-oriented innuendoes, jokes, banter, "kidding," comments, storytelling, derogatory comments, or slurs.
 - c. Physical contact such as touching, patting, pinching, brushing against another person's body, or impeding or blocking normal movement.
 - d. Non-verbal conduct such as leering, obscene gestures, invading of personal space, the display of sexually suggestive objects, suggestive posters, cartoons, or drawings to include Internet, e-mail, social media, and any other form of communication.
- 4.7 Violence: Acts in the Workplace, or which have an effect upon the Workplace, of abusive or violent behavior; physical violence; sexual, emotional, and psychological intimidation; verbal abuse; stalking; and economic control that has the potential to cause physical, mental, emotional, or other harm to others. Violence in the Workplace includes such acts committed by Jacobs' employees, customers, contractors, or vendors of any tier, temporary workers, relatives, visitors, or strangers against persons in the Workplace, or which has an effect upon the Workplace.
 - 4.7.1 Violence in the Workplace, or which has an effect upon the Workplace, includes but is not limited to:
 - a. Domestic Violence: The use of Violence between people who have an ongoing or have had a prior intimate relationship.

- b. A prior intimate relationship could include relationships between people who have been married, have cohabitated, or have had any other kind of intimate involvement.
- c. Actual or potential intimidation: Engaging in or threatening actions that include, but are not limited to, stalking or behavior intended to frighten, coerce, or induce duress.
- d. Physical attack: Unwanted or hostile physical contact such as hitting, fighting, pushing, shoving, or throwing objects.
- e. Property damage: Damage to property. This includes property owned, leased by, or under the control of Jacobs wherever located; as well as property of Jacobs' employees, temporary workers, contractors, vendors, consultants, and customers that is located on Jacobs' premises. It also includes any Threat of property damage.
- f. Stalking: Willfully, maliciously, and repeatedly following or harassing another person, or making a credible Threat with the intention to place that person in reasonable fear of death or great bodily injury.
- g. Threat: The expression of intent to cause physical or mental harm. An expression constitutes a Threat without regard to whether the party communicating the Threat has the present ability to carry it out and without regard to whether the expression is contingent, conditional, or future.

4.8 Workplace: Any location, either permanent or temporary, where an employee performs any work-related duty or uses Jacobs' resources. This includes, but is not limited to:

- 4.8.1 Buildings and surrounding perimeters, including parking lots, field locations, and alternate work locations.
- 4.8.2 Work-related travel locations, such as airports, hotels, restaurants, or other transit locations.
- 4.8.3 Company-owned, leased, or rented vehicle, or employee's vehicle while conducting Company business.
- 4.8.4 Non-work locations (e.g., restaurants, bars, holiday celebration venues, etc.) where work related events are sponsored or held, and/or non-work locations where Harassment or Discrimination, Sexual Harassment or Bullying occurs and where the impact of such conduct reaches back into the Workplace.

5.0 INTRODUCTION:

None.

6.0 POLICY:

6.1 General.

- 6.1.1 Any requests for exceptions or deviations to this Policy must be submitted to the process owner as per procedure JJ-QL-PR-0050-JJ, *Deviations*.
- 6.1.2 This Policy is supported by global JJ-CE-PL-9000-JJ-H-01, *Code of Conduct* which forms part of the terms and conditions of an employee's employment relationship with Jacobs, including where applicable the "at-will" nature of such relationship.
- 6.1.3 In locations where local applicable law provides greater protection than the provisions of this Policy, local applicable law shall be followed. In these situations, local Human Resources (HR) shall communicate applicable differences.

6.2 Requirements.

- 6.2.1 The Company expects employees to behave with dignity and respect and be aware of this Policy. Workplace Harassment, Discrimination, Bullying, and Violence are strictly prohibited.
- 6.2.2 The Company's work environment should be free of Harassment, Discrimination, Bullying, and Violence for any reason including but not limited to those protected characteristics as set forth in the 4.3 Harassment or Discrimination definition above.
- 6.2.3 Company Policy and/or local applicable law prohibit coworkers and third parties, as well as supervisors and managers, with whom the employee comes into contact from engaging in Harassment, Discrimination, Bullying or Violence.
- 6.2.4 The Company prohibits all forms of Harassment, Discrimination, Bullying, and Violence, regardless of whether it happens to be illegal under the law of the jurisdiction where it occurs or whether it happens to be acceptable within local cultural norms in a country where the Company is working. What may appear to be common behavior in certain countries because of local customs may still be a prohibited conduct under this and other Company policies because it is not consistent with the Company's values, principles, and expectations.
- 6.2.5 Employees and staff must treat colleagues and others with dignity and respect and should always consider whether their words or conduct could be offensive, demeaning and/or belittling.
- 6.2.6 Employees and staff should take the time to ensure they understand this Policy and what types of behavior are unacceptable, both in and out of the Workplace (i.e., business trips, events, or social functions), or which has an effect upon the Workplace.
- 6.2.7 Even unintentional Harassment, Discrimination, Bullying, or Violence is unacceptable and, in some cases, unlawful.

6.3 Potential Liability.

Any form of Harassment, Discrimination, Bullying, or Violence may subject both the Company and those individuals personally committing such acts to legal liability; conduct and behavior does not have to rise to the level of illegality under applicable law in order to violate this Policy.

6.4 Impact Versus Intent.

- 6.4.1 Conduct and behavior under this Policy are measured and assessed by determining the impact on the targeted person or group. The intent of the individual is not the focus when determining offensiveness.
- 6.4.2 The questions asked are whether a reasonable person would be offended under the circumstances and whether the complaining party was personally offended. Keep in mind that differences in the protected characteristics as set forth in the 4.3 Harassment or Discrimination definition above may result in different views as to what is offensive and what is not.

6.5 Supervisor/Subordinate Romantic and/or Sexual Relationships Prohibited.

- 6.5.1 Romantic and/or sexual relationships between a subordinate employee and anyone who has direct or indirect supervisory authority or is in a position of authority ("Supervisor" for purposes of this section) over the subordinate employee undermine the atmosphere of trust essential to the employment relationship and

may result in claims of Harassment or Discrimination, including Sexual Harassment. Also, there are unique risks in romantic and/or sexual relationships between employees in inherently unequal positions of power. The power differential inherent in such relationships may compromise the subordinate employee's free choice. As a result, the relationship may be less consensual than the Supervisor believes. Additionally, other employees who believe they are treated and/or evaluated unfairly because of such a relationship may make claims of Harassment or Discrimination.

- 6.5.2 Consequently, it is a violation of this Policy for a subordinate employee and a Supervisor to become involved in a romantic and/or sexual relationship. When a romantic and/or sexual relationship develops or exists, the Supervisor must immediately disclose the relationship to their Immediate Supervisor (or, in the case of the CEO, to the Lead Director of the Board of Directors) ("Immediate Supervisor") and to Human Resources. The subordinate employee may disclose the relationship to the Immediate Supervisor and to Human Resources. A manager or supervisor who becomes aware of a romantic and/or sexual relationship between a Supervisor and a subordinate employee must disclose the matter to Human Resources. The Immediate Supervisor and Human Resources, in consultation with Legal, will determine the appropriate course of action including, but not limited to transfer or termination of one or both employees. Under no circumstances shall the Supervisor make or participate in any decisions that affect the compensation, evaluations, working hours, or any other employment conditions of the subordinate employee. See also the global policy JJ-EB-PL-6230-JJ, *Employment of Relatives*.
- 6.6 Reporting Suspected Incidents of Harassment, Discrimination, Bullying or Violence.
- 6.6.1 Any employee has the right and obligation to report Harassment, Discrimination, Bullying or Violence whether directed at the employee or observed by the employee. Employees reporting Harassment, Discrimination, Bullying, and Violence in the Workplace, or which have an effect upon the Workplace, may do so to any supervisor or manager in their reporting line, to HR, to the Jacobs Integrity Hotline (see below), or to a member of Legal. If reporting to a supervisor, manager, HR or Legal, employees must report incidents of Harassment, Discrimination, Bullying or Violence to an individual who is not involved in the allegation of Harassment, Discrimination, Bullying or Violence.
- 6.6.2 Managers and supervisors are required to immediately report any complaints (whether received directly or indirectly) of potential Harassment, Discrimination, Bullying, and Violence (or other misconduct) to Human Resources, who will engage with Legal as determined necessary, so the Company can investigate and, when determined to be necessary, take steps to resolve the complaint. This obligation by managers and supervisors exists even when the complaint of Harassment, Discrimination, Bullying or Violence is directed at the manager or supervisor receiving the complaint, and even when the individual submitting the complaint does not report to the manager or supervisor directly.
- 6.6.3 All incidents of Violence in the Workplace, or which have an effect upon the Workplace, must immediately be reported to a member of management, Human Resources, and Global Security & Resilience. See the global policy JJ-SU-PL-9600-JJ, *Firearms and Weapons*.

- 6.6.4 Any incident that results in a physical or psychosocial injury that requires any form of medical treatment, days away from work, restricted/reduced work duties or transfer to another job shall be reported and recorded in accordance with the work instruction JJ-HS-WI-0400-JJ, *HSE&S Incident Management*. Any incident that results in the damage or loss of Jacobs property or assets shall be reported in accordance with the before mention procedure.
- 6.6.5 Any employee who witnesses or is a victim of Harassment, Discrimination, Bullying or Violence in the Workplace, or which has an effect upon the Workplace, may also report the incident anonymously to the Jacobs Integrity Hotline as follows:
- a. Call: +1 (844) 543-8351 or refer to the Integrity Hotline: Toll-free international calling codes (available toll-free 24 hours a day, 7 days a week).
 - b. Email: askaquestion@jacobs.com.
 - c. Submit a report <https://secure.ethicspoint.com>.
 - d. Mail inquiries to:
Jacobs Integrity Hotline
C/O EthicsPoint
P.O. Box 230369
Portland, Oregon 97223
United States
- 6.7 External Complaints of Harassment or Discrimination.
- Nothing in this Policy is intended to prevent employees from pursuing other avenues of recourse if they believe they have experienced or are experiencing Harassment, Discrimination, Bullying, and Violence in the Workplace, or which have an effect upon the Workplace. Such recourse may include filing a complaint with an appropriate federal agency (e.g., the U.S. Equal Employment Opportunity Commission or its local jurisdiction equivalent), or any other national, state, or local agency.
- 6.8 Investigation.
- 6.8.1 The Company shall provide a timely acknowledgement to any report of alleged Harassment, Discrimination, Bullying or Violence.
- 6.8.2 The Company shall ensure an investigation is conducted by qualified personnel.
- 6.8.3 The investigation shall be timely under the circumstances and conditions present, fair, and thorough; the investigation should be conducted consistent with the local law and policies applicable to investigations; and appropriate due process should be provided based on local law applicable to such investigations.
- 6.8.4 The Company will close the investigation in a timely manner, as such may be affected by the circumstances and conditions present.
- 6.8.5 If determined appropriate and necessary to the circumstances based on the investigation, the Company shall take appropriate remedial and other steps to prevent further offences.
- 6.9 Confidentiality.
- 6.9.1 Confidentiality is an important part of the processes provided under this No Harassment, Discrimination, Bullying, and Violence Policy. While the Company cannot guarantee absolute confidentiality, the Company is committed to maintaining such confidentiality to the fullest extent possible under the circumstances and conditions applicable to the complaint. In this regard, everyone

involved in the operation of this Policy, whether making a complaint or involved in any investigation, is responsible for observing the high level of confidentiality that is required. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis and as is necessary to permit investigation into the complaint.

- 6.9.2 Any employee who violates confidentiality in a manner inconsistent with this Policy may be subject to appropriate disciplinary action, up to and including termination of employment (see JJ-EB-PR-6800-JJ, *Performance and Behavior Improvement Discussions*).
- 6.10 Disciplinary Action.
 - 6.10.1 Any employee who violates this Policy or encourages another to violate this Policy shall be subject to undertaking appropriate remedial measures and/or subject to disciplinary action, up to and including termination of employment (see JJ-EB-PR-6800-JJ, *Performance and Behavior Improvement Discussions*).
 - 6.10.2 Any employee who makes a complaint of Harassment, Discrimination, Bullying or Violence in bad faith, or who deliberately provides false information or otherwise acts in bad faith as part of an investigation, shall be subject to appropriate disciplinary action, up to and including termination of employment (see JJ-EB-PR-6800-JJ, *Performance and Behavior Improvement Discussions*).
- 6.11 No Retaliation.
 - 6.11.1 Company Policy forbids retaliation against any employee who opposes Harassment, Discrimination, Bullying or Violence in the Workplace, or which has an effect upon the Workplace, files a complaint, or testifies or participates in an investigation (see the global policy GPS01-103-15, *Whistleblower*) in relation to a complaint.
 - 6.11.2 No action will be taken against any employee who reports a complaint of Harassment, Discrimination, Bullying or Violence in good faith, no matter what the outcome of the investigation.
 - 6.11.3 Prohibited retaliation includes, but is not limited to, demotion; suspension; termination; failure to hire, promote, or grant merit increases; or failure to consider for hire, promotion, or grant of merit increases.
- 6.12 Training.

Corporate HR is to ensure information and/or required training regarding Harassment, Discrimination, Bullying or Violence prevention and reporting are communicated and made available to employees upon hire, and periodically thereafter, as necessary.
- 6.13 Maintenance.

Corporate HR, in consultation with Legal, shall review the No Harassment, Discrimination, Bullying, and Violence Policy regularly and recommend changes as appropriate.
- 6.14 Records.
 - 6.14.1 Confidential records relating to reports of Harassment, Discrimination, Bullying or Violence; investigations; and outcomes shall be maintained in appropriate Company records by HR or other such group responsible for maintenance of such records.
 - 6.14.2 Confidential disciplinary action records shall be maintained in the employee's personnel file.

6.15 Responsibilities.

Responsibility for compliance with this Policy rests with every Company director, officer, manager, and employee.

6.16 Questions.

Questions regarding Harassment, Discrimination, Bullying, or Violence may be directed to Human Resources through a Global People Services request.

7.0 DESCRIPTION OF REVISIONS:

Rev #	Date	Reason for Changes
0	1-JAN-19	Initial release.
1	6-DEC-19	2.3.1 – Removed exclusion of employees of the Aerospace, Technology and Nuclear Line of Business. 5.2 – Moved reference to Code of Conduct Policy from 5.2 to 6.2.
2	12-DEC-19	3.0 – Added policy numbers, updated links, and revised list to reflect changes in 5.0 and 6.0. 4.1 – Added BMS Glossary. 4.3.1.5 - Revised. 4.6 - Revised. 4.8.4 - Added non-work locations. 5.1 - Moved to 6.2.1. 5.2 – Removed reference to Health, Safety and Environment Policy. 6.0 – Added and revised headings. 6.1.2 - Revised 5.2 and placed here. 6.2.2 - Revised. 6.5.2 - Added reference to forthcoming Employment of Relatives Policy. 6.8 Responsibilities – Revised and moved to 6.15. 6.8 Investigation, 6.8.2 - Revised. 6.12 Training - Revised.
3	19-DEC-19	Changed mentions of “Jacobs Solutions” back to “Jacobs Engineering Group”. Reverted to original logo.
4	28-MAY-2021	Administrative changes to align to current policy template, apply new logo, change pronouns to be gender neutral, add reference to Global People Services, and correct Rev 3 Reason for Changes.