

Harassment Policy

January 2019

It is the goal of the Company to promote a workplace that is free of sexual and other unlawful harassment by employees, clients, independent contractors, vendors or non-employees of Turner, at a work site or when you are involved in any business relationship as part of your job. Sexual and other unlawful harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by the Company. This policy applies to all incidents of alleged harassment, including those which occur off premises, or off-hours, 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. To achieve our goal of providing a workplace free from sexual and other unlawful harassment, we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees. 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 harassment complaint, is similarly unlawful and will not be tolerated.

The Company takes allegations of sexual and other unlawful harassment seriously. We will respond promptly to complaints of harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual and other unlawful harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual or other unlawful harassment.

SEXUAL HARASSMENT

Definition of Sexual Harassment

Sexual harassment is defined as sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- (a) submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment, or made a basis for employment decisions such as favorable reviews, salary increases, promotions, increased benefits or continued employment, regardless of whether the harasser actually carries through with the threats to alter the subordinate's terms or conditions of employment;

Or

- (b) such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating, or sexually offensive work environment.

Other sexually-oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which, if unwelcome, may constitute sexual harassment, depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances, whether they involve physical touching or not;

- Sexual epithets, slurs, jokes, written or oral references to sexual conduct; gossip regarding one's sex life; comments on an individual's body, comments about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, cartoons;
- Leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Sending or circulating, whether in print or electronic form, literature or communications (articles, magazines or e-mails) of a sexual nature;
- Inquiries into one's sexual experiences; and
- Discussion of one's sexual activities.

Complaints of Sexual Harassment

If any of our employees believes that he or she has been subjected to sexual harassment, the employee should promptly file a complaint with his/her Project Manager, Operations Manager, Project Executive, Department Head or Human Resources Director/Manager. This may be done in writing or orally. These people are also available to discuss any concerns you may have and to provide information to you about our policy on sexual harassment and our complaint process. If you feel uncomfortable bringing the matter to one of the persons listed above, you can raise the issue directly with the business unit General Manager or equivalent senior executive, or Senior Human Resources Director. You may also follow Turner's internal complaint and grievance procedure to resolve complaints by contacting compliance@tcco.com or call The Network at 888-738-1924.

Any supervisor or manager who has reason to suspect harassment or retaliation is occurring must notify the Human Resources Director/Manager.

All employees should take special note that, as stated above, retaliating against an individual who has complained about sexual harassment, and retaliating against individuals for cooperating with an investigation of a sexual harassment complaint, is unlawful and will not be tolerated by this Company. However, if after investigating any complaint of harassment the Company determines that the complaint is frivolous and was not made in good faith, or that an employee has provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the bad-faith complaint or who gave the false information.

All complaints will be kept confidential to the maximum extent possible, and all employees have an obligation to maintain this confidentiality whether they are involved in the complaint or investigation or otherwise become aware of the complaint. All employees have a duty to report any conduct that they believe violates this policy. In addition, every employee has a duty to cooperate with any investigation conducted by the Company, regardless of whether the investigation is being conducted by Company officials or outside parties retained by the Company for this purpose.

Sexual Harassment Investigation

When we receive a complaint we will promptly investigate the allegation in a fair, timely, and thorough manner that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation may include a private interview with the person filing the complaint and with any witnesses. We may also interview the person alleged to have committed sexual harassment. When we have completed our investigation, we 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 it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate we will also impose disciplinary action up to and including termination of employment.

The Company'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

The Company strongly supports the rights of all its employees to work in an environment free from all forms of unlawful harassment, including harassment on the basis of race, sex, gender, gender identity, gender expression, transgender status, sexual orientation, pregnancy, childbirth and other pregnancy-related conditions, color, national origin, ancestry, age, religious creed, citizenship, marital status (including registered domestic partners), parental status, physical disability, mental disability, medical condition, genetic information, military or veteran status (including protected veteran status), or any other characteristic or status protected by law.

Unlawful harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of a protected characteristic, and that:

- (a) creates an intimidating, hostile or offensive working environment;
- (b) unreasonably interferes with an individual's work performance; or
- (c) otherwise adversely affects an individual's employment opportunities.

Unlawful harassing conduct includes, but is not limited to:

- epithets;
- slurs;
- negative stereotyping;
- threatening, intimidating or hostile acts that relate to a protected characteristic;
- written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of a protected characteristic, and that is placed on walls, bulletin boards, or elsewhere on the employer's premises, or circulated in the workplace on paper or electronically.

The Company prohibits unlawful harassment or retaliation of any kind. Any violation of the Company's unlawful harassment or retaliation policy should be reported in accordance with the complaint procedure in the Sexual Harassment policy and the complaint will be handled in the manner set forth in that procedure.

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.

Employee's Responsibility

- All employees should avoid contributing directly or indirectly to any form of harassment in the workplace.
- Report any observed or potential harassment promptly and confidentially to management and/or to the Human Resources Director/Manager.
- Cooperate fully in any investigation in a discreet, confidential, and sensitive manner. Failure to cooperate may be grounds for disciplinary action.

Supervisor's Responsibility

- Maintain an open-door policy for employees to communicate potential concerns at an early stage and seek counsel from the Human Resources Director/Manager.
- Take all complaints or concerns of alleged or possible harassment seriously, no matter how minor or who is involved.
- Report any alleged incidents or receipt of formal complaints immediately to the appropriate management and to the Human Resources Director/Manager.
- Cooperate fully in any investigation and maintain confidentiality to the extent possible.
- Take appropriate action to prevent retaliation or prohibited conduct from reoccurring during and after any investigations or complaints.
- Communicate support of the policy and guidelines throughout the organization.
- Make sure that all employees 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 the 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 or retaliation are in violation of this policy and subject to disciplinary action.

Prevention Program

Avoidance of harassment and sexual harassment requires constant supervisory and management awareness. Publication of this policy reaffirms the Company's desire to eliminate any form of harassment. Anti-harassment training is provided to all employees throughout the Company annually, or as otherwise required by state or local law. The resulting work environment should be one sensitive to harassment and sexual harassment issues and one positioned to prevent violations. We trust that all our employees will continue to act responsibly to establish and maintain a harassment-free working environment.