



Business Management System Policy		Document No: JJ-EB-PL-6820-JJ	Page: 1 of 10
No Harassment, Discrimination, Bullying, and Violence		Effective Date: 29-OCT-2024	Rev. No: 10
Issuing Process: Human Resources	Process Owner: Global Human Resources Process Owner		

1.0 PURPOSE:

To provide the Company Policy to ensure, promote, and maintain a Workplace environment free from all forms of Harassment, Discrimination, Bullying, and Violence and reassure that complaints relating to alleged behavior of Harassment, Discrimination, Bullying, or Violence will be investigated consistent with the local applicable laws and policies. The Company does not tolerate, nor does it accept conduct or actions inconsistent with this Policy.

The Company sustains its culture by remaining true to its purpose and values. This means promoting inclusion, celebrating diversity, and approaching everything with acceptance and respect. The Company is committed to ensuring the education of its employees on these important topics and principles, and by this Policy encourages and/or requires 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 BMS processes that interact with, are impacted by, or interrelate with this Policy:

- a. Legal;
- b. Legal 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 Solutions Inc. and all of its lines of business, business units, subsidiaries, operations, and departments, 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 AU-CE-PL-9010-AU, Whistleblower Protection.

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

3.3 JJ-CE-PL-9010-JJ, Whistleblower Protection.

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

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

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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.

- 4.4 Jacobs or Company: These terms are used throughout the Policy, and all refer to Jacobs Solutions Inc. and its subsidiaries and affiliates worldwide.
- 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 and/or abuse: The use of Violence and/or abuse 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 to include remote working 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 events and/ or locations (e.g., restaurants, bars, holiday celebration venues, etc.) where work related events are sponsored or held, and/or non-work events and/or locations where Harassment or Discrimination, Sexual Harassment, or Bullying occurs

6.8 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.

6.9 Investigation.

6.9.1 The Company shall provide a timely acknowledgement to any report of alleged Harassment, Discrimination, Bullying, or Violence.

6.9.2 The Company shall determine the scope of any investigation and that it is conducted by qualified personnel.

6.9.3 The investigation shall be timely under the circumstances and conditions present, fair, reasonable, and appropriate in scope; 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.

6.9.4 The Company will close the investigation in a timely manner, as such may be affected by the circumstances and conditions present.

6.9.5 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.

6.10 Confidentiality.

6.10.1 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.

6.10.2 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.

6.11 Disciplinary Action.

6.11.1 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.

6.11.2 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.

6.12 No Retaliation.

6.12.1 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 JJ-CE-PL-9010-JJ, *Whistleblower Protection* and where applicable the Australia policy AU-CE-PL-9010-AU, *Whistleblower Protection*) in relation to a complaint.

- 6.12.2 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.
- 6.12.3 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.
- 6.13 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.
- 6.14 Maintenance.
Corporate HR, in consultation with Legal, shall review the No Harassment, Discrimination, Bullying, and Violence Policy regularly and recommend changes as appropriate.
- 6.15 Records.
 - 6.15.1 Confidential records relating to reports of Harassment, Discrimination, Bullying, or 6.8 Inestiga.8.201see

Rev #	Date	Reason for Changes
		6.12 Training - Revised.
3	19-DEC-2019	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.
5	7-DEC-2021	1.0 Purpose revised to state the company's promotion of inclusion and diversity. 4.3 revised definition of Harassment or Discrimination, to include protected characteristic of "gender reassignment" and added example of "homophobic or anti-LGBTQ+ jokes, comments, actions, or other derogatory or stereotypical remarks." 4.7 revised definition of Violence, to include "abuse" with "domestic violence" as type of Violence. 6.7 added to provide reference to Employee Assistance Program and Positive Mental Health Champions. 2.2.1, 3.0, 4.2, 6.1.2, 6.5.2, 6.9, and 6.12 revised to align with current standard wording or to provide clarity.
6	16-AUG-2023	Made non-substantive administrative changes. 2.1.1.b, and 2.2.1, and 6.6.5.a revised to current standard wording. 4.4 revised definition of Jacobs to current standard wording. 3.0, 6.10.2, and 6.11 removed mentions of JJ-EB-PR-6800-JJ, Performance and Behavior Improvement Discussions since that procedure has been made obsolete. 6.17 replaced Global People Services with Help Hub and updated the associated URL.
7	12-DEC-2023	Made non-substantive administrative change. 6.7 replaced Employee Assistance Program with Emotional Wellbeing Solutions and updated associated URL.
8	17-JUL-2024	6.15.3 added.
9	28-OCT-2024	Made the following non-substantive changes. 2.2.1 and 6.12.1 updated to current standard wording. 4.3.1.k.ii revised for clarity.