



corporate policy

policy no. PCG 400

date January 1, 2023

supersedes December 1, 2022

Subject: EQUAL EMPLOYMENT OPPORTUNITY (EEO) POLICY

PURPOSE

Performance Contracting Group, including its subsidiaries and its affiliated companies (PCG), is committed to a policy of Equal Employment Opportunity (EEO) that values diversity and inclusion in the workplace. It is the policy of PCG to provide equal opportunity and access for all persons, without regard to actual or perceived age, race, religion, color, sex, national origin, genetic information, sexual orientation, gender identity and expression, disability, status as a protected veteran, uniformed servicemember status, medical condition, pregnancy status or any other characteristic protected by federal, state, or local laws, regulations or ordinances. This policy of non-discrimination applies to all phases of the employment process, including but not limited to, recruiting or recruiting advertising, hiring, selection for training, including apprenticeship, promotion, demotion or transfer, layoff, recall, termination, rate of pay or other form of compensation and professional development practices.

PCG is committed to providing a workplace free from unlawful discrimination and harassment. As such, PCG will not tolerate discrimination or harassment against any of our employees on the basis of membership in a protected category. Employees and applicants of PCG will not be subjected to any form of harassment or discrimination for exercising rights protected by, or because of their participation in an investigation or compliance review related to, the Americans With Disabilities Act, Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, the Veterans Employment Opportunities Act of 1998, or any other federal or state non-discrimination law, rule, or regulation. Such rights include protection against discrimination on the basis of a person's relationship or association with a protected veteran.

Although not an exhaustive list, below are examples of conduct that could constitute a violation of this policy:

- Harassment on the basis of race, color, religion, sex, national origin, disability, genetic information, or age;
- Retaliation against an individual for filing a charge of discrimination, participating in an investigation, or opposing discriminatory practices;
- Employment decisions based on stereotypes or assumptions about the abilities, traits, or performance of individuals of a certain sex, race, age, religion, or ethnic group, or individuals with disabilities, or based on myths or assumptions about an individual's genetic information; and

- Denying employment opportunities to an individual because of the individual's race, religion, national origin, or disability, or because of their participation in schools or places of worship associated with a particular racial, ethnic, or religious group.

PAY TRANSPARENCY NONDISCRIMINATION PROVISION - PCG will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by PCG, or (c) consistent with PCG's legal duty to furnish information.

INTERNAL REPORTING PROCEDURE - Any employee who learns of, observes, or has reason to be concerned about conduct in violation of this policy must promptly report the facts and names of the individuals involved to a department or branch manager, Human Resources, or any other member of management. An employee may also choose to retain anonymity by utilizing PCG's Ethics Helpline, TOLL FREE at: 1-866-794-1777. Complaints may be verbal and do not need to be made in writing.

INVESTIGATION - PCG takes violations of this EEO policy very seriously. As a result, all complaints made pursuant to this policy will be thoroughly and promptly investigated.

CONFIDENTIAL NATURE OF THE INVESTIGATION In the course of any such investigation, PCG will take appropriate measures to maintain the confidentiality of the participants to the extent possible. Although it may be necessary to divulge some information to ensure that a fair investigation is conducted, PCG will limit information to only those individuals with a need to know of the complaint or of the investigation.

NO-RETALIATION STATEMENT – Retaliation against anyone who complains or witnesses behavior contrary to this policy is strictly prohibited. All parties contacted in the course of an EEO investigation will be expressly reminded that PCG will not tolerate retaliation in any form against any employee who believes or is concerned that a violation of the EEO policy has occurred and reports such conduct pursuant to this policy. If an employee believes that he or she is experiencing retaliation as a result of having made a complaint pursuant to this policy or having participated in an EEO investigation, he or she must promptly report the facts and names of the individuals involved to a department or branch manager and/or Human Resources. An employee may also choose to retain anonymity by utilizing PCG's Ethics Helpline, TOLL FREE at: 1-866-7941777. Complaints may be verbal and do not need to be made in writing.

DISCIPLINARY ACTION - If an investigator concludes that conduct in violation of this policy has occurred, the offending individual(s) will be subject to appropriate corrective action, including formal discipline, up to and including termination of employment.

FORMAL TRAINING - To ensure that PCG's employees remain educated about their obligations under this policy, PCG will require all employees to periodically receive training regarding our commitment to equal employment opportunities in the workplace.

AFFIRMATIVE ACTION PROGRAM - PCG also maintains affirmative action programs to implement our equal employment opportunity policy for women, minorities individuals with disabilities and protected veterans. Employees or applicants who wish to review the full narrative portion of PCG's affirmative action program for individuals with disabilities or protected veterans may schedule an appointment to do so by contacting Robyn Kavanagh, Director of Human Resources during normal business hours.

REASONABLE ACCOMMODATION – PCG is committed to providing reasonable accommodations for the known physical or mental essential duty limitations of an otherwise qualified individual with a disability, who is an employee or applicant for employment, unless undue business hardship and/or a significant risk to the health and/or safety of the individual or fellow employees/others would result. All requests for reasonable accommodation must be directed to Human Resources (HR) via contacts listed below.

If you need assistance or an accommodation due to a medical condition or disability, you may contact us at HumanResources@pcg.com or you may call us at 913.888.8600.

Jason Hendricks
President & CEO