



POLICY NO. PCG 400
DATE: FEBRUARY 13, 2019

EQUAL EMPLOYMENT OPPORTUNITY (EEO) POLICY

Performance Contracting Group, (PCG) its subsidiaries and its affiliated companies, 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 apply recruiting, hiring, training, promotion, compensation and professional development practices without regard to actual or perceived age, race, religion, color, sex, national origin, genetic information, sexual orientation, gender Identity and expression, disability, veteran status, uniformed servicemember status, medical condition, pregnancy status or other characteristic protected by federal, state, or local laws, regulations or ordinances. EEO laws are violated when an individual is either denied employment or is subject to an adverse employment action because of the individual's membership in a protected category, listed above.

PCG is committed to providing a workplace free from unlawful discrimination (including harassment). As such, PCG will not tolerate discrimination against any of our employees on the basis of membership in a protected category.

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.

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 and/or Human Resources. 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.

EXTERNAL GOVERNMENT REMEDIES - In the event you have not found resolution through PCG's internal reporting procedures; complaints regarding violations of equal employment opportunity laws can also be made to the United States Equal Employment Opportunity Commission at one of its field offices.



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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 - 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. Moreover, PCG will protect any employee who participates in any such investigation from any resulting retaliatory conduct. 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: 1-866-794-1777. Complaints may be verbal and do not need to be made in writing.

For additional information regarding retaliation, refer to complete Retaliation Policy, #461

DISCIPLINARY ACTION - If an investigator concludes that conduct in violation of this policy has occurred, the offending individual(s) will be subject to 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.

If you need assistance or an accommodation due to a disability, you may contact us at HumanResources@pcg.com or you may call us at **1-800-255-6886**.