

EQUAL EMPLOYMENT OPPORTUNITY POLICY

January 1, 2023

It is the continuing policy of Walbridge, its subsidiaries, divisions, affiliates and Joint-Ventures (the "Company") to afford full equal employment opportunity to all team members and applicants regardless of their race, color, national origin, sex, religion, age, status as an individual with a disability, military or protected veteran status, height, weight, familial status, marital status, sexual orientation, gender identity, or any other protected condition or characteristic in conformity with all applicable federal, state and local laws and regulations. In accordance with this policy, all personnel decisions, including but not limited to those relating to recruitment, hiring, training, promotion, compensation, benefits, transfers, education, and tuition assistance, will continue to be made in accordance with the Walbridge Equal Employment Policy.

Accordingly,

1. All team members and applicants for employment, regardless of race, color, national origin, sex (including pregnancy, sexual orientation, gender identity and transgender status), marital status, parental status, religion, age, status as an individual with a disability (physical or intellectual), military or protected veteran status, height, weight, or any other protected condition or characteristic will be treated with respect, dignity, and professionalism.
2. Every team member and candidate for employment will have the freedom to compete on a fair and level playing field with equal opportunity.
3. Managers and supervisors will ensure fairness, equity and equal opportunity in personnel employment programs, management practices, and decisions, including, but not limited to, recruitment, hiring, compensation, benefits, company sponsored training, career development, tuition assistance, merit promotions, transfers, reassignments, separations, reduction in force and return from layoffs, and will preserve the confidentiality of record regarding arrest, detention, or other disposition in which a conviction does not result.

Any applicant or team member who requires an accommodation to perform the essential functions of the job must contact Human Resources and request such an accommodation. Walbridge and the individual requesting the accommodation will engage in an interactive process to determine an appropriate reasonable accommodation. The individual requesting the accommodation should specify what accommodations are needed to perform the job. Walbridge will investigate the requested accommodation and will identify possible accommodations, if any, that will eliminate the limitation. If the accommodation is reasonable and will not impose undue hardship, Walbridge will make the accommodation.

Discrimination or harassment by any supervisory or non-supervisory team member based upon the protected conditions or characteristics listed above or any other legally protected condition or characteristic, is a violation of the Code of Conduct. A team member or applicant, who believes that he or she has been the subject of such discrimination or harassment, should promptly report the alleged incident to the Corporate Compliance Officer. A confidential and impartial investigation of the alleged act of discrimination or harassment will be undertaken immediately. If it is found that a prohibited act of discrimination or harassment did occur, prompt corrective action, including discipline up to and including discharge, will be taken against all responsible team members.

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Team members and applicants can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion, or discrimination because they: (1) file a complaint with Walbridge or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute; (3) oppose any act or practice made unlawful by federal, state, or local law requiring equal employment opportunity or affirmative action; or (4) exercise any other employment right protected by federal, state, or local law or its implementing regulations.

I personally make my commitment to all the objectives of equal employment opportunity and expect the cooperation and participation of all team members of the company in achieving these objectives.



Mike Haller (CEO)