

ABM is committed to providing a work environment that is free of prohibited harassment. As a result, the Company maintains a strict policy prohibiting sexual harassment and harassment against applicants and employees based on any legally-recognized status, including, but not limited to: race, color, religion, sex, pregnancy "including lactation, childbirth or related medical conditions", sexual orientation, gender identity, age "\$% and over", national origin or ancestry, physical or mental disability, genetic information "including testing and characteristics", veteran status, uniformed servicemember status or any other status protected by federal, state or local law.

The Company's anti-harassment policy applies to all persons involved in its operations, regardless of their position, and prohibits harassing conduct by any employee of ABM, including supervisors, managers and nonsupervisory employees. This policy also protects employees from prohibited harassment by third parties, such as customers, vendors, clients, visitors, or temporary or seasonal workers. If such harassment occurs in the workplace by someone not employed by ABM, the procedures in this policy should be followed. The workplace includes: actual worksites, any setting in which work-related business is being conducted "whether during or after normal business hours", company-

* sexual harassment includes various forms of offensive behavior based on sex. &he

Any applicant or employee who believes that he or she has been subjected to prohibited harassment or retaliation by a co-worker, supervisor, manager, client, visitor, vendor, customer or temporary or seasonal worker of ABM, or who believes another individual has been subjected to such conduct, should report it immediately. Applicants and employees are encouraged to report concerns, even if they relate to incidents in the past, involve individuals who are no longer affiliated with ABM, or concern conduct occurring outside of work if it impacts the individual at work.

Reports should be made to!

5. The ABM Compliance Hotline at 5-677-8976 or abmhotline.ethicspoint.com
8. Our local Human Resources Representative or regional Director.

Employees are encouraged, but not required, to communicate to the offending person that his/her conduct is offensive and unwelcome. Any lead, foreperson, supervisor or manager who receives a complaint of harassment or retaliation must immediately report the allegation to Human Resources.

After a report is received, a thorough and objective investigation will be undertaken. Confidentiality will be maintained to the extent practical and permitted by law. Investigations will be conducted as confidentially as possible and related information will only be shared with others on a need-to-know basis. The investigation will be completed and a determination made and communicated to the employee as soon as practical.

If a complaint of prohibited harassment or discrimination is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken. If a complaint cannot be substantiated, the Company may take appropriate action to reinforce its commitment to providing a work environment free from harassment.

All lead, forepersons, supervisors and managers are responsible for!

Implementing this policy, which includes, but is not limited to, taking steps to prevent harassment and retaliation,

Ensuring that all employees under their supervision have knowledge of and understand this policy,

Promptly reporting any complaints to the designated Human Resources Representative so they may be investigated and resolved in timely manner,

&aking and)or assisting in prompt and appropriate corrective action when necessary to ensure compliance with this policy, and

Conducting themselves, at all times, in a manner consistent with this policy.

>ailure to meet these responsibilities may lead to disciplinary action, up to and including termination.

3etaliation is prohibited against any person by another employee or by ABM for using this complaint procedure, reporting proscribed harassment, ob-ecting to such conduct or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. 2rohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give e+ual consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

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