

National Anti-Harassment Policy

Creating a workplace environment that prioritizes the well-being and dignity of every individual is fundamental to the core values of Turner. We are committed to fostering a culture that is built on equity, inclusivity, and the absolute absence of bias or discrimination. Turner maintains a steadfast zero-tolerance stance against any form of sexual or unlawful harassment, whether directed towards or perpetrated by employees, applicants, temporary workers, gig workers, interns, volunteers, clients, independent contractors, vendors, or any other individual associated with Turner ("Included Individuals").

Harassment, in any shape or form, occurring within Turner's premises or in connection with Turner-related activities, is unequivocally prohibited. This policy extends to all instances of alleged harassment, encompassing incidents that transpire outside of traditional work settings or hours. Whether during business events, travel, virtual interactions, or on personal devices, Turner ensures that all individuals are safeguarded from harassment by supervisors, managers, colleagues, or third-party associates engaged in business with Turner.

Our commitment to maintaining a harassment-free workplace is underscored by robust procedures designed to promptly address and manage any reported incidents of misconduct. Turner does not tolerate any form of retaliation against individuals who raise concerns about harassment or cooperate in investigations related to harassment complaints. We firmly believe that every person deserves to work in an environment characterized by mutual respect and professional integrity. Anything less contradicts our values and will not be condoned.

Allegations of sexual or unlawful harassment are taken with utmost seriousness at Turner. Upon receiving a complaint, we initiate swift and thorough investigations to determine the facts and take appropriate corrective actions, including disciplinary measures when warranted. Our goal is not only to rectify the immediate situation but also to foster a workplace culture where proactive measures prevent harassment from occurring in the first place.

It is important to note that while this policy outlines our commitment to promoting a workplace free from sexual and unlawful harassment or discrimination, Turner reserves the right to address any conduct that falls short of our standards of behavior, regardless of whether it meets the legal definition of harassment. The impact of behavior on individuals and our workplace environment is paramount in our assessment and response.

Turner remains steadfast in our dedication to continuous improvement and adherence to legal standards concerning harassment and discrimination. This policy serves as a guiding principle in our efforts to cultivate a respectful, safe, and supportive workplace environment for all individuals associated with Turner.

Objectives

Our aim is to maintain a workplace environment where every individual is treated with respect and dignity. Any behavior that falls short of these standards will not be tolerated.

Sexual Harassment

Sexual harassment, a form of unlawful discrimination, is strictly prohibited at HennanGroup. This includes unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of a sexual nature that creates a hostile, intimidating, or offensive work environment.

Other Unlawful Harassment

In addition to sexual harassment, HennanGroup prohibits all forms of unlawful harassment based on protected characteristics such as age, race, ethnicity, religion, disability, gender identity, sexual orientation, and any other characteristic protected by applicable law. This includes conduct that creates a hostile or offensive work environment or interferes with an individual's work performance.

Reporting and Investigation

Employees and individuals associated with HennanGroup who experience or witness harassment are encouraged to report incidents promptly to their supervisor, Human Resources, or any designated authority within the organization. We take all complaints seriously and will conduct thorough investigations to address and resolve reported incidents promptly and fairly.

Non-Retaliation

HennanGroup strictly prohibits retaliation against any individual who reports harassment or participates in an investigation regarding a harassment complaint. We are committed to protecting those who raise concerns in good faith.

Prevention and Awareness Programs

HennanGroup is dedicated to preventing harassment through proactive measures. Our prevention programs include regular training sessions for employees at all levels. These sessions educate employees on recognizing inappropriate behavior, understanding the impact of harassment, and promoting a culture of mutual respect and inclusivity.



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Responsibilities of Managers and Supervisors

Managers and supervisors play a crucial role in upholding our anti-harassment policy. They are expected to lead by example, foster a respectful work environment, and promptly address any concerns or complaints of harassment that come to their attention. Managers and supervisors must ensure that all employees under their supervision are aware of this policy and understand their rights and responsibilities.

Confidentiality and Privacy

HennanGroup treats all reports of harassment with the utmost confidentiality and sensitivity. We understand the importance of privacy for individuals involved in harassment complaints, whether they are complainants, witnesses, or alleged offenders. All information gathered during the investigation process will be handled discreetly and shared only with those who have a legitimate need to know.

Consequences of Violating the Policy

Violations of this anti-harassment policy will result in appropriate disciplinary action, up to and including termination of employment for employees found responsible for harassment. For non-employees, such as contractors, vendors, or clients, violating this policy may lead to termination of business relationships or other corrective measures as deemed necessary by HennanGroup.

Legal Compliance

HennanGroup complies with all applicable federal, state, and local laws regarding harassment and discrimination. Our policy is designed not only to meet legal requirements but to exceed them by fostering a supportive and respectful workplace for all individuals.

Continuous Improvement

We are committed to regularly reviewing and updating our anti-harassment policy to ensure its effectiveness and relevance. Feedback from employees, legal developments, and best practices in the field of workplace harassment prevention will inform our ongoing efforts to maintain a safe and respectful work environment.

Employee Support Resources

HennanGroup understands that experiencing or witnessing harassment can be distressing. We provide access to confidential support resources for employees who have been affected by harassment. These resources include counseling services, employee assistance programs, and referrals to external support agencies. Our goal is to assist employees in coping with the



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emotional and psychological impacts of harassment while ensuring their privacy and confidentiality.

Community Engagement

Beyond our internal efforts, HennanGroup actively engages with our broader community to promote awareness and prevention of harassment. We participate in community events, collaborate with local organizations, and sponsor initiatives that advocate for diversity, equity, and inclusion. By extending our commitment beyond our workplace, we aim to create a ripple effect of positive change in the communities where we operate.

Transparent Communication

HennanGroup is committed to maintaining open and transparent communication regarding our anti-harassment policies and procedures. We provide regular updates and reminders to all employees about the policy's importance, reporting mechanisms, and support resources available. Clear communication ensures that every member of our organization understands their rights and responsibilities in fostering a harassment-free workplace.

Metrics and Accountability

To gauge the effectiveness of our anti-harassment efforts, HennanGroup monitors key metrics related to harassment complaints, investigation outcomes, and employee feedback. This data helps us identify trends, areas for improvement, and ensure accountability in addressing incidents promptly and fairly. We regularly report on these metrics to senior management and the Board of Directors to demonstrate our commitment to maintaining a respectful work environment.

Conclusion

At HennanGroup, we believe that a workplace free from harassment is fundamental to our success and the well-being of our employees. By upholding these principles, we create an environment where everyone can thrive professionally and personally. Together, we foster a culture of respect, inclusion, and dignity that defines who we are as an organization.

Effective Date: June 2024