

## Policy

Parsons is committed to providing a work environment that is free of discrimination and harassment. In keeping with this commitment, the Corporation maintains a strict policy prohibiting unlawful harassment of any kind, including sexual harassment and harassment based on race, color, creed, religion, national origin, ancestry, ethnicity, age, sex, gender, sexual orientation, disability, medical condition as defined by law, pregnancy, childbirth, breastfeeding and related medical conditions, marital status, citizenship status, military or veteran status, family status, natural hair texture and protective hair styles, genetic information, gender assignment, gender expression and gender identity, LGBTQIA+ status, pardoned conviction, language spoken (including French in Canada), or any other basis protected by applicable law or regulations.

All applicants for employment will be recruited or hired based on merit, qualifications, and the ability to perform the essential functions of the position. All personnel actions (assignments, transfers, promotions, training, discipline, compensation, subject to lay off, recall, and termination) solely based on merit, performance, and qualifications to perform the available work. All employees, regardless of their race, color, creed, religion, national origin, ancestry, ethnicity, age, sex, gender, sexual orientation, disability, medical condition as defined by law, pregnancy, childbirth, breastfeeding and related medical conditions, marital status, citizenship status, military or veteran status, family status, natural hair texture and protective hair styles, genetic information, gender assignment, gender expression and gender identity, LGBTQIA+ status, will be treated equally with regard to the administration of company benefit plans, education tuition assistance and social and recreation programs for which they qualify.

Parsons has a zero-tolerance policy for discrimination and harassment of any kind. The Corporation shall take all allegations of harassment or discrimination seriously, respond promptly and will take appropriate remedial or disciplinary action up to and including termination. This includes any employee who interferes with the resolution of a harassment or discrimination complaint; retaliates against an individual for filing a harassment complaint or for participating in the resolution process, or files an unfounded harassment complaint intended to cause harm. This policy is not meant to inhibit properly discharged managerial responsibilities including appropriate disciplinary action.


Employees are required to undergo harassment prevention training as required by applicable law, which includes training on preventing harassment based on sexual orientation, gender identity, and gender expression. This training is provided by the Company. For more information about this training requirement in California, visit <https://www.dfeh.ca.gov/shpt/>.

Parsons has established a process for the resolution of complaints in a manner that is timely, consistent, fair, and confidential and that respects the rights and dignity of all parties. All parties to a harassment or discrimination complaint are expected to respect the privacy and confidentiality of all other parties involved and to limit the discussion of a harassment complaint to those that need to know.

## Reporting and Investigation

Any employee who believes they have been the recipient of or witness to any form of harassment, discrimination, or abusive, taunting or demeaning behavior, should report such conduct including the facts of the incident or incidents and the names of the individuals involved to their immediate supervisor, another supervisor, or in the alternative, to the Human Resources Department or an Ethics Officer immediately. Reports may also be submitted to the company's hotline at [Parsons Ethics Helpline](#). It is the responsibility of each

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employee to immediately report any violation or suspected violation of this policy to one or more of the individuals identified above. U.S. based employees may also use the Employee Dispute Resolution Program to formalize a complaint regarding an incident of any form of unlawful harassment or discrimination.

The Human Resources Department will investigate all such claims in a fair, impartial, timely and thorough manner and take appropriate corrective action, including disciplinary action when it is warranted. Investigations will be documented and tracked for reasonable progress and timely closure. All information collected in the investigation process will be kept confidential to the extent possible.

During the investigation, the Company will attempt to interview the complainant and the accused, conduct further interviews as necessary and review all relevant documents or other information. Upon completion of the investigation, the Company shall determine if a policy violation has occurred based upon its reasonable evaluation of the information gathered during the investigation. The Company will generally inform the complainant and the accused if a violation of policy has occurred, and that corrective action will be taken as a result of the investigation.

### Workplace Restoration

If policy violations or resolutions disrupt workplace relationships, management may seek support from Human Resources to implement strategies that restore or improve workplace relationships.

## Scope

Persons covered under this policy include all applicants for employment, all employees including full and part time, casual, contract, temporary employees including supervisors and non-supervisory employees, employer agents and non-employees, including vendors and independent contractors, in all work-related settings, and all work-related activities such as business travel, and socializing for business or corporate sponsored events,.

## References

### Other Parsons References:

- [Harassment Prevention Training](#)
- [Parsons Ethics Helpline](#)

### External References:

- [California Sexual Harassment Prevention Training](#)

## Definitions

**Discrimination:** Treating an individual differently or denying or granting a benefit to an individual related to the protected groups identified in this policy in all aspects and activities of the employment relationship.

**Harassment:** A form of discrimination defined as engaging in conduct that a reasonable person would consider offensive or unwelcome.

**The Canada Labour Code** (the Code): defines harassment and violence at subsection 122(1) as “any action, conduct or comment, including of a sexual nature that can reasonably be expected to cause offence, humiliation or other physical or psychological injury or illness to an employee, including any prescribed action, conduct or comment.”

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**Sexual Harassment:** Sex is interpreted as gender difference and so, the prohibited grounds of sex, sexual orientation, gender, gender assignment, gender identity and gender expression apply. Sexual Harassment includes but is not limited to:

- Quid pro quo harassment is defined as “unwanted sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature” when submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment or is used as the basis for employment decisions affecting such individual.

Quid pro quo harassment involves someone in a supervisory capacity, or position of influence over another employee, who can confer or withhold a tangible employment benefit based on the employee’s response to sexual advances, requests for sexual favors, or verbal or physical conduct of a sexual nature. Such sexual harassment may include harassment by an individual of the same gender or based on sexual orientation, gender identity, or gender expression. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment or is used as the basis for employment decisions affecting the individual.

- Hostile, offensive, or poisoned work environment harassment is defined as conduct which has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, abusive, unwelcoming, hostile, or offensive work environment due to sexual advances, gender-based animosity, or a sexually charged workplace, or animosity based on sexual orientation, gender identity, or gender expression. Hostile, offensive, or poisoned work environment harassment does not involve a direct sexual bargain between a supervisor and subordinate, as in quid pro quo harassment, but includes any form of sexually oriented harassment or anti-LGBTQIA+ harassment that is sufficiently severe or pervasive as to alter the conditions of the victim’s employment and create a hostile, offensive or poisoned work environment. Hostile, offensive, or poisoned work environment sexual harassment can involve supervisors, coworkers, and even non-employees such as client representatives, visitors, contract laborers, consultants, vendors, and other third parties who interact with employees based on a business relationship with the Corporation. Harassment can also include conduct or comments consistently targeted at only one gender, sexual orientation, gender identity, or gender expression, even if the content is not sexual, or teasing or other conduct directed toward a person because of the person’s gender, sexual orientation, gender identity, or gender expression.

**Gender Expression and Identity include:**

- “Gender Expression” refers to gender-related appearance or behavior, regardless of whether it is stereotypically associated with the individual’s sex at birth.
- “Gender Identity” is identification as male, female, transgender, or a gender different than the person’s sex at birth.
- “Sex stereotype” is an assumption about someone’s appearance or behavior – or about the ability or inability to perform certain types of work – based on a myth, social expectation, or generalization about that person’s sex.
- “Transgender” refers to someone whose gender identity is different from the person’s sex at birth.

- "LGBTQ+" is an acronym that stands for lesbian, gay, bisexual, transgender, queer, questioning, and the "+" sign represents additional gender identities and sexual orientations.

**Conduct Involved in Unlawful Harassment or Discrimination:** Unlawful harassment or discrimination may take many forms, including:


- Verbal conduct, such as epithets, derogatory comments, slurs, jokes, unwanted sexual advances, invitations, or comments
- Physical conduct, such as assault, blocking normal movement, or interference with work directed at an employee because of the employee's sex or other protected characteristic
- Visual and nonverbal conduct, such as derogatory posters, cartoons or drawings, or gestures
- Threats and demands to submit to sexual advances or requests in order to keep one's job or avoid some other loss and offers of employment benefits in exchange for sexual favors
- Retaliation for having reported unlawful harassment
- Hate activity
- Excluding someone/withholding job related information, or unequal application of the work rules because of any of the grounds prohibited by this policy
- Refusal to work with or share facilities with other employees because of any of the grounds prohibited by this policy

Using social media or the public display of materials that create a negative, hostile, or unpleasant workplace

Note: Sexual harassment does not preclude mutually acceptable social relationships that develop in the workplace. Compliments given to individuals and other exchanges that are socially acceptable, professional, and free from sexual innuendo or gender bias typically are not considered sexual harassment.

**Duty to Accommodate (Canada)** Parsons will take steps, short of undue hardship, to adjust rules, policies, and practices to enable the full participation of employees or prospective employees in the workplace. The circumstances that require accommodation typically include but are not limited to the prohibited grounds of sex, family status, pregnancy, religion, gender, or disability. Employees are required to provide relevant information about their needs in order to determine how best to accommodate them.

**Duty to Inquire (Canada):** requires the employer to initiate a conversation about accommodation, in circumstances where the employer knows or ought reasonably to know that the employee may need some form of accommodation, recognizing that employees do not always come forward because stigma or fear may make them reluctant to request accommodation. Generally, it is the individual's responsibility to ask for accommodation and to disclose their accommodation needs to the employer. However, recent human rights laws, now require managers to initiate action in certain circumstances, to determine if an accommodation is needed, and the nature of the accommodation, even if the employee has not asked for it. This obligation placed on the employer, recognizes that stigma or fear make individuals reluctant to request accommodation.

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**Undue Hardship:** exists when an accommodation for an individual or a class of individuals affected would impose undue hardship on the person who would have to accommodate those needs, considering health, safety, and cost. This may include accommodations that are unduly extensive, substantial, disruptive, would fundamentally alter the nature or operation of the business or create health or safety risks.

**Natural Hair Texture and Protective Hair Styles:** defined as braids, LOCS twists, afros, and curls.

## Responsibilities

Parsons has established a process for the resolution of complaints in a manner that is timely, consistent, fair, and confidential and that respects the rights and dignity of all parties. All parties to a harassment or discrimination complaint are expected to respect the privacy and confidentiality of all other parties involved and to limit the discussion of a harassment complaint to those that need to know.


Any employee who believes they have been the recipient of or witness to any form of harassment, discrimination, or abusive, taunting or demeaning behavior, should report such conduct including the facts of the incident or incidents and the names of the individuals involved to his or her immediate supervisor, another supervisor, or in the alternative, to the Human Resources Department or an Ethics Officer immediately. Reports may also be submitted to the company's hotline at <https://www.parsonsethicshelpline.com>. It is the responsibility of each employee to immediately report any violation or suspected violation of this policy to one or more of the individuals identified above. U.S. based employees may also use the Employee Dispute Resolution Program to formalize a complaint regarding an incident of any form of unlawful harassment or discrimination.

Management and all employees have the responsibility to maintain a work environment free of harassment and discrimination. Supervisors or managers who learn about any incidents of harassment or discrimination must immediately report the incidents to the Human Resources Department or an Ethics Officer.

Parsons supervisors are expected to conduct themselves in an appropriate manner, not condone or participate in unlawful harassment or discrimination, and be alert to instances of this type of behavior. Any manager, supervisor, employee, or agent who has been found by the Corporation to have violated this policy or where it can be established that managers ought reasonably to have known that harassment or discrimination was taking place under their supervision, will be subject to corrective action up to and including the possibility of termination. If an employee believes that reprisal, intimidation, or retaliation has occurred it is to be reported to a supervisor, an Ethics Officer, Human Resources Representative, the Employee Dispute Resolution Hotline, or the Ethics Helpline.

## Exceptions

None.

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## Revision History

Revision	Changes	Approver	Approval Date
1	Remove language around Canadian duty to inquire and duty to accommodate as this information is duplicated in the Disability and Accommodation Policy – North America; added language around LGBTQ+ harassment	Balaguer, Susan	Jan-9, 2025
0	Original issue - replaces Harassment Policy Rev 8	Balaguer, Susan	Dec-5-2022

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